

# EXHIBIT

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Declaration of Peter C. Salerno  
In Support of Defendant Yassin Kadi's Motion  
To Exclude the Testimony of Victor Comras

03 MDL 1570

July 31, 2023

# OFAC TDY TO ALBANIA

● April 30, 2002 – May 21, 2002

● - A Review of the Kadi Companies -

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**ALBANIA TRIP REPORT**  
**April 30, 2002 – May 21, 2002**

To: [REDACTED]

From: [REDACTED]

Date: May 28, 2002

Subject: **Preliminary Findings of OFAC TDY Effort.**

Office of Foreign Assets Control (OFAC) officers [REDACTED] completed their review of the Kadi documents on May 21, 2002. Originally, the trip was scheduled for one week but stretched much longer due to the volume of material to be reviewed. By the time the team departed on Tuesday, May 21, 2002, Officers [REDACTED] had been in country for three weeks while [REDACTED] had completed two weeks.

The team's goals, as laid out upon its arrival, was to (1) look for evidence that supports the designation of Sheik Yassin Kadi as a Specially Designated Global Terrorist under U.S. Executive Order and (2) assist the Albanian government in its criminal money laundering case against the companies and Kadi. To accomplish this, the team had to review nearly 100 linear feet of documents (to include business correspondence, bank statements, payment vouchers, handwritten notes, and ledgers) and made over 500 copies of what, in our opinion, are the most crucial documents. This review can only be considered a survey of SHIK's holdings. A full-scale financial audit of the material would require a much greater commitment of time by a team of accountants.

As a result of this study, we found the following items of note in the photocopied records:

- Large cash withdrawals from a Karavan account, paid to Dr. Abdul Latef Saleh, occurring on one day. [See Folders 10.801 - 10.805].
- Large wire transfers into and out of Kadi's personal account. [See Folders 1.401 - 1.407, 1.416, 1.417, 1.419 and 1.501 - 1.503].

- Business and correspondence ties between Kadi and Wa'el Jelaidan, a suspected logistics chief for Osama bin Ladin. [See Folders 3.605, 3.606, 3.607, 5.201, 5.606, 1.907]
- Business and correspondence ties between Kadi and Dr. Abdul Latif Saleh, a confirmed Egyptian Islamic Jihad supporter. [See Folders 2.201, 2.204 - 2.206, 6.105, 6.106, 6.504, 7.201, 7.409, 7.702, 7.901, 8.101, 8.810, 8.815, 8.907]
- A possible link (working at the Kukos school in the late 1990s) between the Kukes representative of Muwafaq Foundation, Petrit Musa, and Selim Tota, the imam of the D. Hoxha mosque in Tirana. [See Musa Interviews].
- A possible link (payment voucher) between the Kukes representative of Muwafaq Foundation, Petrit Musa, and an agent of Al Harimain, an Islamic NGO with possible ties to bin Ladin and Al Qaeda. [See Folder 10.901 and Musa Interviews].

(Photocopied records will be sent via Embassy pouch to OFAC in the coming days. Because the volume of materials collected was too great to hand carry back to the United States, our Embassy contacts made arrangements to forward on our copies).

At this point in the review of documents from Albania, our conclusions are the following:

1. Saudi funds flowed through Albania to Bosnia/Kosovo during the late 1990s.
2. Saudi-backed NGOs were the vehicles that moved investments and donations.
3. Kadi's companies, while not directly involved, aided Jelaidan's and Saleh's agendas (supporting Muslim communities with material, funds, possibly arms).
4. Unfortunately, these conclusions are based on the circumstantial/hearsay evidence that we uncovered while in Albania; the corporate documents we reviewed only hint at this fact.

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5. However, some money movements observed in the Kadi documents appear unusual, indicating possible illicit financial activity that could be raised as an issue.

While the documents reviewed do not categorically indicate that Kadi funneled funds in support of terror activities in the Balkans through his Albanian companies, the documents and interviews conducted do strongly suggest a relationship between Kadi and known terror supporters (Jelaidan, Saleh). Financial money movements observed in many of the confiscated Karavan documents appear unusual and may indicate additional possible illicit financial activity.

Further review of these documents is warranted. A key sampling of these documents will be sent and reviewed further in Washington, DC to fully examine the extent and implication of such observed activities.

Memorandum for the Record

To: [REDACTED]

Via: [REDACTED]

Via: [REDACTED]

From: [REDACTED]

Date: May 8, 2002

Subject: Interview with Former Financial Manager of a Sheik Yassin Kadi Company.

1. The following document is classified Law Enforcement Sensitive.

2. On May 8, 2002, [REDACTED] conducted an interview of Violeta Spaho, the former financial manager of Karavan Construction and Development Company. We were accompanied by two officials of the Albanian Government who participated in the interview and also provided some translation assistance. The meeting was conducted in both English and Albanian and took place in Tirana, Albania.

3. (Comment: Karavan is a construction company owned by Sheik Yassin Kadi, a Saudi national believed to be providing support to Islamic fundamentalists in the Balkans through front companies. Albanian national Violeta Spaho was identified as a senior accountant within the Karavan organization from records retrieved from the company's main offices in Tirana. Spaho's name and signature was found on numerous cash transactions and financial ledgers from at least 1997 on. In particular, she withdrew large rounded amounts (\$5-20,000) often on consecutive days and sometimes more than once a day for purposes not reflected in the records reviewed to date. For example, a preliminary review of financial records of 1997 indicates she and other Karavan accountants made 62 such withdrawals for a total of \$553,000. The interview was conducted in order to define her role within the organization, determine her relationship with key company officials, and clarify the nature of the transactions she was involved in.)

4. The following text is a record based on notes taken during the conversation. The participants have had a chance to review the text for accuracy. This represents a true record of the meeting to the best of our recollection:

a. Violeta Spaho has been an employee of the company since June 1996. The company actually was registered in 1995. Her responsibilities included dealing with the Albanian government on issues relating to oversight of the "society" (local term for business); providing trial balances to her manager Eng. Amr El Zainy at the end of each month (who was very scrupulous about checking and signing every document she

gave him to review); checking all financial documents; registration of all cash payments and receipts; general ledger work and delivery of money to the bank. As the chief of the finance department, she managed 5 people and worked with the company's "cost centers"--identified as general accounting, cashier, store, payment and exchange; the exchange aspect involved converting dollars into leks and vice versa. Spaho did almost all of her records on paper and had very little material on the company's computers.

b. Spaho did most of the company's banking with Arab Albanian Islamic Bank (AAIB) with a smaller role for International Commerce Bank. Most money coming from "outside" (presumably including international wire transfers) came through AAIB. She also noted that her relationship with officers from each bank were "normal." On one occasion, Sheik Kadi wired money to Karavan through American Express Bank. Spaho knows that Kadi's firms had some dealings with Faisal Finance and had records of some of those transactions.

c. Spaho claims that not that much money was cashed out of the bank (done infrequently) and only then to meet expenses. In such cases, the expense was documented and certified and then the debt was paid. She then stated that she was unaware of any instance where management cashed out any significant amount except in a case where a worker was injured and needed treatment. Later she would admit that Karavan also had made a loan from their cash holdings to another Kadi firm, Medicare, when it was not doing well. The loan was later paid back. There were loans to other companies but she could not provide details. When money was withdrawn as cash, Spaho said that she would round it out so that the extra could be added to the petty cash holdings. For contractors, she would convert the dollars into leks.

d. In terms of contributions to charities, Spaho claims that the only charitable endeavors she was aware of that Karavan undertook was a bridge in Skapar (phonetic) that the company built and a hospital (which was done at the behest of the charity Red Moon Foundation which may be the same as the Red Crescent Society). Payment for these projects was covered in equal parts (50%) by Sheik Yassin Kadi and ALINTID. The total for these projects came to \$60,000 according to Spaho. *At this point, she contended that all expenses and/or payouts, such as for charitable contributions, were recorded in her books along with amounts that she could not remember unless she had the books in front of her (at point she reiterated several times during the course of the conversation).*

e. When asked if Karavan was a profitable firm, Spaho responded that they were a "good" firm that used quality materials, paid its debts (wages, taxes, insurance) on time, made a decent profit, and was a growing venture. Spaho pointed out that the firm did not close for a single day during the 3 months in 1997 when the government virtually collapsed. To illustrate the firm's ability to turn a profit, she noted that Karavan could build an apartment building for about \$235 per square meter and could sell it for around \$320. She could not or would not name any other paying clients of Karavan.

f. Spaho was unsure about the financial health of other Kadi firms such as Lox Holl (Lojal) and Waleed because she had nothing to do with them. As far as she could remember, there were only two periods in which large amounts of funds were transferred into the company from outside: around 1996-97 when Sheik Kadi and ALINTID invested \$500,000 each into the firm and in 1999 when the same parties each invested \$250,000 into the Twin Towers project to cover the company's construction expenses before revenue from sales would start flowing in. Another point Spaho covered about Karavan was wages; Albanians were paid in cash (leks) while the Arab employees were paid by check (dollars) which they took to the bank to cash/deposit. Spaho had no dealing with any other element of Karavan, including the one in Turkey.

g. When asked of her impressions of other Karavan officers, Spaho provided the following:

- **Abdul Latif Saleh.** He was the general manager of all of Kadi's "societies/businesses" in Albania and was very powerful within the organization. *Saleh was the only person who had authorization to withdraw money directly from Sheik Yassin Kadi's bank account and transfer the funds whenever the situation required it.* Within Karavan, Saleh mostly worked with subcontractors making business calculations and then Spaho would have to pay for their work. For a long time,

Saleh's was the first signature required on a check. Later, he transferred this responsibility to Amr El Zainy who reported to him. More recently, Saleh spent more time out of the office (which may be why he transferred the check signature authority to El Zainy) because of his work with his charity--Foundation Life Sciences. This outfit made calendars in Turkey for distribution to people for free and ran some kind of training course. Karavan's only financial transaction with FLS was a payment of \$50,000 to pay for calendars--which FLS paid back. Saleh traveled out of Albania once or twice a year.

- **Sheik Yassin Kadi.** Spaho only met him twice when he visited Karavan but never dealt with him in any meaningful way. He did not seem to care very much about the company. Most Albanians who worked for Kadi didn't know him very well.
- **Amr El Zainy.** Very exacting. A demanding boss as far as documenting expenses was concerned.
- **Tarek Nasser.** When he first arrived from Egypt, he worked with Violeta Spaho doing cost accounting. Later, he moved to CAFO, another entity within the Kadi group, where he worked with his father, Dr. Nassar, doing the general ledger which was sent to the head office. He later went on to become the general manager of the Albanian Snacks factory where he apparently did not do a good job.
- **Wael Jelaidan.** Never heard of him.
- **Ayadi Chafik bin Muhammad.** Never heard of him.

h. **Muwafaq Foundation** was provided money directly from Karavan when they had expenses to be met. Karavan was then reimbursed by Kadi. Spaho viewed Muwafaq as a temporary organization largely because the foundation's financial people were not in Albania.

i. Another element of the Kadi business empire that Spaho did accounting work for was **Karavan Joint Venture (KJV)**. KJV was tied to the main Karavan company but was registered as a separate firm to make the paperwork easier. KJV's role was the management of the construction projects leaving Karavan free to concentrate on building. The two entities each had their own sets of books. Spaho did general ledger work for them.

k. Spaho had minimal dealings with **ALINTID**. This firm was focused on providing investment funds for construction projects in Albania. The only interaction Spaho mentioned was a single incident in which 2 Saudis visited Albania to review her books and seemed very satisfied with how they were organized.

5. (Comment: Spaho arrived at the meeting visibly nervous and was animated when providing answers. The interviewing officers agreed that she appeared to be withholding information or may have been purposefully vague when providing answers to questions such as those on large cash transactions as she tried to gauge the situation. The interview ended on a positive note, however, as she stated she would be willing to submit to a second interview. She noted that while she has been managing Karavan's affairs since the blockage [e.g. collecting old debts and paying bills], she has not been paid in months. As a result, she seems to feel free to look after her own interests. Spaho, while defending Karavan as a good company that created jobs, said she was an Albanian and that is where her allegiances lie. Treasury officers hope to have another chance to talk with her prior to the conclusion of their current TDY.)

FOR PASSAGE TO: [REDACTED]

TREASURY DEPARTMENT

SUBJECT: STATUS REPORT OF ALBANIAN TDY TEAM, 5/10/02

1. THE OFAC TDY TEAM IS CONTINUING ITS INVESTIGATION OF SHEIK YASSIN KADI'S ACTIVITIES IN ALBANIA. THUS FAR, THE TEAM IS APPROXIMATELY 50% COMPLETE WITH ITS REVIEW OF THE DOCUMENTS AND HAS COMPLETED ONE INTERVIEW WITH A FORMER KARAVAN ACCOUNTANT. ALTHOUGH NO EVIDENCE DIRECTLY TYING KADI TO TERRORIST GROUPS HAS BEEN FOUND, A NUMBER OF SUSPECT RELATIONSHIPS AND TRANSACTIONS HAVE EMERGED.

2. THE MOST PROMISING MATERIAL FROM OUR OPTIC IS THAT WHICH CONNECTS KADI WITH WAEL JELAIDAN, A SUSPECTED UBL LOGISTICS CHIEF IN EUROPE. KEY DOCUMENTS UNCOVERED BEARING JELAIDAN'S NAME INCLUDE:

A. A FAX FROM ABDULFATTAH NASSAR, THE HEAD OF THE CENTRAL ACCOUNTING AND FINANCE OFFICE (CAFO; A FINANCIAL UNIT SERVING KADI'S COMPANIES IN ALBANIA WITH BOOKKEEPING AND OTHER FINANCIAL ACTIVITIES), TO KADI. HANDWRITTEN ON THE TOP OF THE PAGE IS THE NOTATION "ATTN: MR. WAEL JELAIDAN CC: MR. MASOOD SYED." THE FAX LAYS OUT FINANCIAL INFORMATION FOR KADI ON THE STATUS OF HIS FINANCIAL DEALINGS WITH EURO INVEST INCLUDING A USD 1 MILLION PAYMENT ON A LOAN; A BALANCE OF DM 3.588 MILLION IN AN ACCOUNT; DM 1.1 MILLION WORTH OF CHARITABLE CONTRIBUTIONS IN BOSNIA IN 1997; USD 200,000 IN CONTRIBUTIONS SPLIT BETWEEN THE RISALA SCHOOL (BOSNIA) AND DR. ABDUL LATIF SALEH; TRADING LOSSES OF DM 3.7 MILLION; RECEIVABLE DEBTS OF 2.3 MILLION; AND REAL ESTATE WORTH DM 1.2 MILLION. THE FAX WAS DATED 3 NOVEMBER 1998.

B. A LETTER TO KADI FROM NASSAR WITH JELAIDAN AND MASOOD SYED CC'ED THAT DISCUSSES ITEMS TO BE DEDUCTED FROM A MORABAHA ACCOUNT AT EURO INVEST INCLUDING DM 74,284 FOR "TAIBAH;" DM 1.09 MILLION FOR CHARITABLE ACTIVITIES IN 1997; USD 100,000 FOR THE RISALA SCHOOL AND 100,000 FOR DR. ABDUL LATIF SALEH-ALBANIA. THE LETTER WAS DATED 29 JUNE 1998.

C. A FAX FROM NASSAR DIRECTLY TO JELAIDAN DISCUSSING THE EFFECTS OF CURRENCY FLUCTATIONS ON LOANS DENOMINATED IN USD AND BOSNIAN DINARS EXCHANGED INTO DM. THE FAX WAS DATED 23 MAY 1998.

D. A PROPOSAL FROM SOHAIL SIDDIQI TO NASSAR DISCUSSING THE RELOCATION OF STAFF WITHIN KADI GROUP COMPANIES. IN IT, SIDDIQI MENTIONS THAT DEVELOPMENTS WITHIN THE GROUP HAVE TO BE VIEWED IN "LIGHT OF THE DECISIONS MADE BY SH. YASSIN KADI REGARDING THESE COMPANIES, SUCH AS OPENING OF AN ACCOUNT FOR EURO INVEST FOR ALL RECEIPTS TO BE ONLY UTILIZED ON THE INSTRUCTION OF SH. YASSIN KADI OR MR. WA'EL JELAIDAN." THE LETTER IS DATED 15 SEPTEMBER 1998.

E. A LETTER FROM NASSAR TO KADI WITH JELAIDAN AND SYED CC'ED IN WHICH NASSAR DISCUSSES HIS INTENTION TO GO TO BOSNIA FOR TWO MONTHS. THE LETTER IS DATED 1 DECEMBER 1998.

F. AN ALBANIAN-LANGUAGE DOCUMENT THAT MAY COME FROM A FIRM CALLED "SEFERI" THAT APPEARS TO BE INVOLVED IN BUILDING AN UNIDENTIFIED STRUCTURE IN SKRAPAR (FOR WHICH KARAVAN RECEIVED PAYMENT). JELAIDAN'S NAME APPEARS AT THE CLOSE OF THE DOCUMENT AS AN "INVESTOR" BUT HIS SIGNATURE IS MISSING. THE DOCUMENT IS DATED 24 OCTOBER 1999 (AFTER HIS EXPLOSION).

G. JELAIDAN'S NAME AND SIGNATURE APPEAR ON AN ARABIC-LANGUAGE DOCUMENT UNDER THE LETTERHEAD OF THE SAUDI JOINT RELIEF COMMITTEE FOR KOSOVA. THE ADDRESS FOR THE MAIN OFFICE OF THIS ORGANIZATION IS THE KARAVAN-BUILT APARTMENT AND OFFICE COMPLEX ON DURRES STREET IN TIRANA. THE SUBJECT AND DATE OF THE DOCUMENT HAVE NOT BEEN TRANSLATED THUS FAR.

3. BACKGROUND: ACCORDING TO A LOCAL CONTACT WHO WAS ONCE A GOVERNMENT MINISTER, JELAIDAN HELD A POSITION AS HEAD OF A COUNCIL (NAME UNKNOWN) THAT COORDINATED THE EFFORTS OF SAUDI NGO'S IN ALBANIA. HE WAS APPOINTED TO THE ROLE IN FEBRUARY 1999 AND HELD IT UNTIL THE ALBANIAN GOVERNMENT DECLARED HIM AN UNDESIRABLE, BARRING HIS RETURN, IN SEPTEMBER 1999. WHILE THE DOCUMENTS LINKING JELAIDAN TO THE SAUDI JOINT RELIEF COMMITTEE (SJRC) HAVE NOT YET BEEN TRANSLATED, THE TEAM HAS BEEN TOLD THAT THE SJRC AND KARAVAN WORKED TOGETHER ON ONE PROJECT TO BUILD A BRIDGE. THE SAME CONTACT INFORMED THE TEAM THAT JELAIDAN, AS HEAD OF THIS SAUDI NGO COUNCIL, WAS EFFECTIVELY IN CHARGE OF THE DISBURSEMENT OF ALL FUNDS BEING PROVIDED BY THE MEMBER NGO'S IN-COUNTRY AS WELL AS THEIR OPERATIONS. HE WAS ALSO A CLOSE CONTACT OF THE LOCAL SAUDI EMBASSY AND MAY HAVE BEEN AN ASSISTANT/CONFIDANT OF THE SAUDI MINISTER OF THE INTERIOR. JELAIDAN ALSO WAS THE INDIVIDUAL WHO HANDLED THE PREPARATIONS FOR THE VISIT OF A SAUDI DELEGATION HEADED BY ARMY CHIEF TURKU BEN FAHD BE ALAOD TO REVIEW PROGRESS IN THE CONSTRUCTION/RECONSTRUCTION OF MOSQUES AND SCHOOLS IN 1999. JELAIDAN'S EXPULSION HAS BEEN A LINGERING BONE OF CONTENTION BETWEEN THE SAUDI AND ALBANIAN GOVERNMENTS. END BACKGROUND.

4. NEXT TO JELAIDAN, THE NEXT MOST INTERESTING CONTACT OF KADI'S IS ABDUL LATIF SALEH. SALEH WAS, PRIOR TO HIS DEPORTATION FROM ALBANIA, THE GENERAL MANAGER OF THE KADI COMPANIES IN THIS COUNTRY. IN ONE DOCUMENT HE IS LISTED AS KADI'S AGENT. THERE ARE FAR TOO MANY RECORDS CONTAINING SALEH'S NAME TO LIST IN THIS FORMAT. WE DO KNOW BOTH FROM THE DOCUMENTS AND THE INTERVIEW CONDUCTED YESTERDAY THAT SALEH HAD SIGNATORY ACCESS TO ONE OF KADI'S MAIN BANK ACCOUNTS. FROM THIS ACCOUNT, HE COULD AND DID WITHDRAW LARGE AMOUNTS OF MONEY; ACCORDING TO ONE LEDGER, SALEH WITHDREW USD 650,000 FROM KADI'S ACCOUNT (CONNECTED TO LOKS-HOLL) IN 4 SEPARATE TRANSACTIONS IN 1996 AND 1997.

5. BACKGROUND: ACCORDING TO THE FORMER HEAD OF KARAVAN'S FINANCE DEPARTMENT, SALEH MOSTLY WORKED WITH SUBCONTRACTORS ON ENGINEERING AND DESIGN. IN ADDITION, SALEH'S WAS THE FIRST SIGNATURE REQUIRED ON ALL CHECKS. OVER TIME, SALEH SPENT MORE OF HIS DAY AWAY FROM THE OFFICE IN ORDER TO WORK ON HIS CHARITY "FLS" (PRESUMABLY FOUNDATION LIFE SCIENCES). THE FORMER FINANCE CHIEF STATED THAT FLS MADE ISLAMIC CALENDARS AND RAN SOME KIND OF TRAINING COURSE. ACCORDING TO THE FORMER GOVERNMENT MINISTER, SALEH WAS ONE OF THE FIRST "ARABS" TO ARRIVE IN ALBANIA AFTER THE FALL OF COMMUNISM AS A REPRESENTATIVE OF THE IIRO. HE ORIGINALLY WAS IN CHARGE OF A MEDICAL CLINIC IN TIRANA WHICH PROVIDED NON-EMERGENCY AID. HE LATER LEFT THE CLINIC TO BECOME THE HEAD OF KARAVAN. END BACKGROUND.

6. IN OTHER AREAS, THE OFAC TEAM IS PURSUING INFORMATION ON THE FINANCES OF THE KADI GROUP, PARTICULARLY HOW IT HANDLED CASH. FROM THE TWO INTERVIEWS CONDUCTED TO DATE, THE STORY HAS BEEN CONSISTENT THAT THE LARGE CASH WITHDRAWALS WERE TO COVER MANY ONGOING EXPENSES SUCH AS PAYMENTS FOR SMALLER CONTRACTORS. FOLLOWUP INTERVIEWS WITH BOTH INDIVIDUALS ARE PLANNED IN WHICH COMPANY RECORDS WILL BE PRESENTED FOR THEIR REVIEW AND EXPLANATION. INTERVIEWS WITH COMPANY MANAGERS AND A FORMER HEAD OF MUWAFAQ FOUNDATION ARE ALSO PLANNED FOR NEXT WEEK.

7. THE ARRIVAL OF [REDACTED] WAS WELCOMED BY ALL. WE ARE LOOKING FORWARD TO HIS ASSISTANCE IN ANALYZING THE FINANCIAL RECORDS. DURING THE SECOND INTERVIEW, HE POSED A NUMBER OF COGENT QUESTIONS WHICH HELPED CLARIFY SOME ISSUES. CATALOGUING OF DOCUMENTS AND ENTERING THEM INTO THE EXCEL SPREADSHEET, CREATED BY [REDACTED] CONTINUES. COPYING OF DOCUMENTS ALREADY INDEXED WILL BEGIN

TOMORROW, OFAC OFFICER ██████████ WILL CONTINUE TO REVIEW NEW DOCUMENTS FOR ADDITIONAL LINKAGE INFORMATION.

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Memorandum for the Record

To: [REDACTED]

Via: [REDACTED]

Via: [REDACTED]

From: [REDACTED]

Date: May 11, 2002

Subject: Interview with Former Accountant of a Sheik Yassin Kadi Company.

1. The following document is classified Law Enforcement Sensitive.

2. On May 10, 2002, OFAC officers [REDACTED] conducted an interview of **Liljana Cavo**, a former accountant with the Karavan Construction and Development Company. We were accompanied by two officials of the Albanian Government who participated in the interview and also provided some translation assistance. The meeting was conducted in both English and Albanian and took place in Tirana, Albania.

3. (Comment: Karavan is a construction company owned by Sheik Yassin Kadi, a Saudi national believed to be providing support to Islamic fundamentalists in the Balkans through front companies. Albanian national Liljana Cavo was identified as an accountant within the Karavan organization from records retrieved from the company's main offices in Tirana in 2001. The interview was conducted in order to define her role within the organization, determine her relationship with key company officials, and clarify what knowledge she may have had of money being funneled Islamic fundamentalist individuals and organizations.)

4. The following text is a record based on notes taken during the conversation. The participants have had a chance to review the text for accuracy. This represents a true record of the meeting to the best of our recollection:

a. **Liljana Cavo** has been in the financial department of Karavan company since February 1996. She started with recording the company's expenses, but later her job expanded to include dealing with the cash flow of the **Karavan Complex**, an office/retail/residential development located on Durrës Street. This did not include the actual sale of apartments as this income was handled by the Marketing Group. For example, she would have to record what the company spent on labor and supplies and what they received in sales.

On a daily basis, this translated in getting documents from other company officers, such as Violeta Spaho, as well as company invoices. She would organize the materials but another accountant would actually enter the figures into the general ledger. She would then prepare a statement at the end of each month to tell what the income was and expenses. The data then went up to **Violeta Spaho and Mr. Amer El Zainy**.

b. Cavo did not do cash withdrawals for the company on any regular basis; that responsibility lay with Spaho. Instead, she would keep cash on hand to meet expenses. She would receive payment vouchers from Spaho that both she (Spaho) and El Zainy would have signed at which point Cavo would then expend the funds. Cavo then would log the expense in a notebook. These expenses included wages to workers which would be paid on the 27th or 28th of each month. Cavo would receive a large amount of funds and from this she would disburse wages in cash from a master list to various offices (the managers in each of the offices would then be responsible for actually handing the cash to each worker). Cavo handled payment issues for Albanian workers but did not deal with the salaries of the foreign workers.

c. When shown a payment voucher, Cavo indicated the form (with Spaho's and El Zainy's signatures) is taken to the cashier at the bank where it is withdrawn in US currency. The money is then taken to an exchange house (one name mentioned was "Arisi") where it is converted to leks. Excess funds would then be kept as petty cash. The main place where cash disbursements were recorded and what they were used for was in the general ledger.

d. When asked about what it was like to work with Amr El Zainy, Cavo said that relations with him were very correct and that he was a good friend with the Albanian workers. Cavo indicated that the locals felt that they could talk to him like a big brother. He was very exact in his work and would make Cavo and other Karavan workers redo something if it was not to his standards. Relations with **Dr. Abdullattaf Nassar**, head of the Central Accounting and Finance Office, were not so friendly as he was a very focused individual. Nassar and El Zainy sometimes seemed to butt heads over procedures but it was difficult to say for certain because they would speak in Arabic. Cavo had seen **Abdul Latif Saleh** 2-3 times but had no regular dealings with him. She knows that Saleh was involved with Lojal, Medicare, and other Kadi companies. She confirmed that Saleh had to sign each check--for large purchases--after Amr El Zainy (El Zainy signed first and then had to present it to Saleh for his countersigning). A woman working for Saleh, possibly as a secretary, kept records of the checks that he would sign.

e. Cavo also spent 6-7 months working at the **Albanian Snack Co.** factory run by Nassar's son, Tarek. Cavo was sent to the factory in order to organize the financials and payment structure so that they mirrored Karavan. This company was not successful because he was not able to handle the responsibilities; Cavo said Tarek was not as exacting as his father. He exerted little control over the management of the plant. He also was absent for large amounts of time which affected Cavo's work since he was not around to sign company papers (she said she wished that El Zainy would have come out to the plant to see for himself what was happening). The factory itself faced problems because the production-line machinery always had problems which the Albanians did not know how to fix. Part of the problem was part of the equipment was from Italy and part of it was from Turkey, and the two systems may not have been very compatible. Cavo said that she never had the respect for Tarek as she did for his father due to his incompetence. The snack factory was closed recently but Cavo had left before that. She and Tarek did not see eye-to-eye and, in fact, had some kind of fight before she left. As a result, she has not kept contact with him and does not know where he lives now. While there had been times that the factory had done well, it was steadily losing money by the end and was down to \$20,000 in cash reserves by the time she left. Cavo noted that when the snack factory needed money to meet expenses, it would go to Karavan for loans. Tarek would go to either El Zainy or Nassar and then would have Spaho do a payment voucher. As if these problems were not enough for the factory, production equipment was stolen from the plant. Cavo did not know if Tarek was in on the thefts but she thought that since Tarek had so little interest in the running of the company, he may not have seen the stuff disappear or even cared. After leaving the snack factory, Cavo went to the Twin Towers project. There has not been much to do since the blockage; only three people work there now--Cavo and two engineers.

f. Cavo had heard of Muwafaq Foundation through Spaho before 1998. There was some mention of an account related to Muwafaq but since Cavo did not see the large general ledger book, she has little knowledge of its finances. She did say that she had heard Spaho and Dr. Nassar discussing it in general terms. She had heard of 1/2 Red Moon which was involved with a Tirana hospital that was doing something for Kosovo refugees. El Zainy visited this hospital repeatedly. Cavo remembers seeing vouchers for payments to Red Moon. She also saw that there were Islamic organizations in the Karavan complex and that there were people waiting to get assistance outside those offices. She did not know their names because their signs were in Arabic.

g. The separation of Karavan and Karavan Joint Venture (KJV) required that they maintain two sets of books (one for each firm) and create two sets of balances at the end of each month. *Cavo said that the management seemed to be moving money from accounts at one company to another. As she put it, she worked for the company for 3 to 4 years and never understood why they created this separation. She never questioned management about it, however, and they felt the need to explain their decision. She left it alone because she felt it was not part of her duties to question their decisions.* In her opinion, she thought that maybe the separation was because Karavan was construction and KJV was Karavan and ALINTID together.

g. Other tidbits:

- Lojal company sold rice, sugar, and flour here.
- Cavo noted that Kadi's investment style was to put money into the company at the onset rather than keep pumping more funds through.
- She did met Kadi twice and then did not deal directly with him. The last time was when he came with a delegation of Saudis. Before such visits, El Zainy would prepare materials for Kadi which included photos.
- One time some accountants from outside the country working for ALINTID came to review the books but they seemed satisfied with the results.

5. (Comment: Cavo seemed reasonably calm and open during the meeting. She answered all questions and provided details about her experiences within Karavan. By the nature of her position, she did not have ready access to the more sensitive areas of the company. She nonetheless had formed some definite opinions about some of the people within the Kadi Group and its procedures.)

MEMORANDUM FOR THE RECORD

To: [REDACTED]

Via: [REDACTED]

Via: [REDACTED]

From: [REDACTED]

Date: May 16, 2002

Subject: Interview with for the former head of a company controlled by Saudi financier Sheik Yassin Kadi.

1. The following document is classified Law Enforcement Sensitive.

2. On May 14, 2002, OFAC officers [REDACTED] conducted an interview with Amr El Zainy, an engineer and former administrator of Karavan Construction and Development Company in Tirana, Albania. We were accompanied to this meeting with Mr. El Zainy by three officials of the Albanian Government who participated in the interview. The meeting was conducted in English.

3. (Comment: Karavan Construction and Development Co. was a construction firm owned/controlled by Sheik Yassin Kadi, a Saudi national, from at least 1996 until its closure due to the Albanian Government's blockage of the firm based on the U.S. Government's designation of Kadi as a supporter of terrorism in October 2001. Karavan was the largest of a number of firms run by Kadi in Albania. Its function was commercial development; major projects included an apartment/retail/office complex on Durrës Street in Tirana [completed] and a large office complex called Twin Towers [under construction at the time of the designation; all activity at the site has now stopped] in central Tirana directly across a major boulevard from the Prime Minister's office. Amr El Zainy, an Egyptian, was originally brought on board Karavan as an engineer but later was promoted to head the company.)

4. The following text is a record based on notes taken during the conversation. The participating OFAC and Albanian Government officials have had a chance to review the text for accuracy. This represents a true record of the meeting to the best of our recollection:

a. Amr El Zainy is currently the ex-administrator of the company. He formally resigned in late January because the situation with the blockage was continuing without resolution and there were internal frictions within the Kadi Group. By law he is supposed to hand over responsibility to someone else within 90 days but has not been contacted by the main office in Jeddah yet so he remains in limbo since he is no longer

actually employed but still responsible for the workers and status of the properties. Karavan is only one of several Albanian companies owned by Yassin Kadi (each one is separate from the others and registered as a stand-alone firm). Most he owned outright and others he was partnered with others. In Karavan's case, for example, he began as the sole owner but later sold 45% of the firm in ALINTID.

b. Comment: At this point, OFAC officer [REDACTED] prompted El Zainy to create a diagram of Kadi's companies. El Zainy did this showing Kadi's degree of ownership and some of the people and partners involved. They include:

Karavan Construction Company (55% Kadi; 45% Albanian International Investment and Development or ALINTID)

Albanian Snacks (55% Kadi; 45% ALINTID)

Loxhall (100%; foodstuff firm managed by Waleed Abu Sheka, a Jordanian)

Lojal (100%; real estate firm managed by Hamza Abu Rayan, a Jordanian)

Medicare (100%; manager is Dr. Nidal Ganim--recently resigned)

Eman (100%; a gold firm; has not operated since the 1997 troubles but continues to exist for tax purposes)

Kavallo (100%; has not operated since the 1997 troubles but continues to exist for tax purposes)

Waleed Co. (ownership interest not denoted but it is a carpet company managed by Waleed Abu Sheka.).

End Comment.

c. ALINTID was described as a "conference" for Arab businesses and businessmen to invest in Albania. The purpose of this entity is to have one place for prospective Albanian partners to go to when seeking investment funding. ALINTID took a 50% share in the Durres Street project and liked it so much that they decided to buy 45% of Karavan. A delegation of ALINTID people came with Kadi when he visited Tirana in 2001. ALINTID did not have as good a result from Albanian Snack Co. which lost money and ultimately went out of business. The relationship between ALINTID and Karavan and even among the ALINTID participants was not exactly smooth and El Zainy had to spent time acting as mediator.

d. El Zainy was then asked about the Central Accounting and Finance Office (or CAFO). He stated that because Kadi could not exert adequate control from his Saudi homebase, he wanted a group of financial experts to control his companies in Bosnia, Albania, and, to a lesser extent, in Turkey. At one point, the head of this entity was Masood Syed; he used to live in Jordan but was brought to Albania to be closer to the firms he would oversee. More recently, the financial control of the companies rested with Dr. Abdul Fatah Nassar. Nassar would generate reports on the firms' financial activities which he would forward a copy to El Zainy.

e. El Zainy clarified one point about the difference between Karavan and Karavan Joint Venture. He does not view them as distinct entities but as a means to separate the accounting of the costs of each, particularly with the involvement of ALINTID. So Kadi took 50% and ALINTID took 50%; Karavan would then deposit a certain amount of funds (10% of its own capital account) so that Karavan Joint Venture would have its own pool of capital to work with.

f. Karavan was registered under Albanian law in 1995 and El Zainy was the first and only administrator. El Zainy's signature is one of two required on all financial documents. Sometimes the second one belonged to Dr. Abdul Latif Saleh. El Zainy is, by training, a construction engineer and was hired by Karavan as such. A few weeks after he arrived, the management at the time were impressed enough with El Zainy's work that they made him the company administrator. One of the first projects the company undertook was the Durres Street complex. It was a success so Karavan went looking for others. One was the construction of a tourist village. That one was fraught with problems including questions regarding the ownership of the land; construction was never finished. The other was the "Twin Towers" project which was under development at the time of the designation.

g. El Zainy then crafted a wiring diagram of Karavan's internal management structure with himself above the line managers:

Administration (Marsela Jahja)

Marketing (Silva Banj)

**Financial (Violeta Spaho)**

**Construction (Eng. Magdi Harras—an Egyptian)**

Spaho had 3 accountants underneath her to handle the financial books and records. Karavan used the American and English accounting systems while Albanians normally use the French. The accountants each handle different issues on their own (the "register" was the purview of Lana (Inu) who has since left for Greece; the store account was Liljana Cavo; and the cost centers belonged to Alketa Duraj who has emigrated to Australia). The cost centers allowed Karavan to break down their costs by category like concrete, steel, or bricks which allowed the company determine their cost per square foot. In addition, they instituted controls so payments are made by check and have to go through a cashier (Marsela Jahja). In some cases they would pay by cash and so the firm would keep about 200,000 leks (about USD 1400) on hand. El Zainy had the finance people establish a system of vouchers and records that kept very close control over company outlays. This way, the company reduced its need to keep large amounts of cash on hand both for security reasons as well as to minimize its risk for counterfeit bills. When more cash was needed than was on hand, someone from the finance department to go to the bank to pick up or deposit the funds. All checks required up to three signatures to cash out.

El Zainy mentioned that sometimes Kadi's companies did need to make inter-firm loans. They did this to meet cash shortfalls. The process was fairly simple with some paperwork to fill out before the requesting firm could get its money (interest-free). One example was the loan Karavan had to make to Albanian Snacks (Comment: From El Zainy's comments, it appears that Karavan may not have recouped this particular loan.) When the requested loan reached a certain level, Karavan had to go to the main office in Saudi for approval even though they all were under the same corporate umbrella.

Karavan itself had to make a request for a single large infusion of funds during the troubles of 1997. The fighting and political instability virtually destroyed the company's cash flow. The head office gave Karavan around USD 1,000,000 at the time (500,000 from Kadi and 500,000 from ALINTID) which they used to keep operations going on the various projects. The money was wire transferred from an account at Faisal Finance via American Express Bank. This money was then put into an account from which the company could draw from (to avoid taxes, the company has to pay the money back into the same account like a loan). As long as the money keeps circulating in the account and does not go back to the partners it is not considered dividends which would be subject to taxation. Some additional money came from Yassin Kadi's personal account through Loxhall for use in purchasing a plot of land.

h. Tarek Nassar was brought in as a favor to his father, Dr. Nassar. Tarek started in CAFO and later they promoted him to the head of Albanian Snacks. This was not a good move as they, the Kadi Group, lost everything with this. Even much of the machinery in the factory was lost as Tarek apparently sold it off in a private agreement with outside parties without the approval of El Zainy. The owners of the company are trying to pursue him legally to recoup some of their money. Tarek may be in Albania but is staying out of sight.

i. Masood Syed is a Pakistani and Kadi's senior accountant. He doesn't control actual expenditures but reviews the accountings of all of Kadi's various investments.

j. Money would be drawn from Karavan on occasion for contributions to NGOs. El Zainy cited an example that when the company was ready to send a large sum of money back to Saudi as profits, the main office instructed Karavan, instead, to give the funds to a charitable cause. Karavan did this transferring the money to a local account controlled by Kadi who would then distribute them by check. One instance involved the transfer of USD 90,000 to the local Muslim community. **Muwafaq Foundation**, when it was around, also received funds in this manner. Cash was rarely involved and then only in small amounts.

k. Another instance of providing aid was when Karavan was approached by a Saudi NGO (Saudi Joint Relief Committee for Kosovo) working in Kosovo on several construction projects. The group's chief was **Wa'el Jelaidan**. El Zainy said Karavan had to give "as if they were our guests." In this case, Karavan did not provide money but, instead, loaned the Saudis the services of one of their engineers to provide technical expertise. Albanian firms would do the actual work but the Karavan engineer would provide

quality control and tell the SJRC when the contractor had completed the work satisfactorily so that they could get paid. El Zainy said one project for Jelaidan's group was the restoration of a big store in Kosovo which had been damaged by the Serbs in Stima (phonetic). Karavan supervised the work and returned to Albania when the project was complete. The relationship between Jelaidan, El Zainy, and Karavan is close on several levels. Their offices were located close enough that El Zainy saw Jelaidan 3-4 times daily. El Zainy also had a close personal friendship with Jelaidan. El Zainy did not get very inquisitive about Jelaidan's business because he was very busy with Karavan's various projects at that point. El Zainy had no reason to suspect Jelaidan was up to nefarious activities at the time since he was doing the same kind of relief work which many NGOs of other countries were up to in Kosovo.

l. Prior to his stint with the SJRC, Jelaidan was a senior supervisor of the Kadi companies. El Zainy remembered that Dr. Latif Saleh treated Jelaidan as his boss when the latter came to visit Kadi's Albanian operations. El Zainy was uncertain but his belief is that Jelaidan was above Saleh in the pecking order of the Kadi Group. El Zainy did not inquire too much since his responsibility went down not up. So El Zainy would deal with Saleh and Nassar, and on occasion with Kadi himself when he came to visit.

Saleh was one of El Zainy's biggest contacts since he had to sign off on all major purchases. Saleh's principal function was to oversee all aspects of the Kadi Group in Albania; nothing of significance would happen without his approval or at least his knowledge. In addition, Saleh had his own financial activities which El Zainy did not seem to know much about. It was normal for Saleh to move large amounts of money through accounts controlled by Kadi. Before El Zainy arrived, Saleh had the ability to pretty much do as he liked (with his power of attorney for Kadi) but after El Zainy arrived that freedom of operation was curbed somewhat. El Zainy believed that Saleh had ambitions to climb even higher within the organization as well as wanting to someday have his own clinic here in Albania. Saleh handled a lot of money that was to be provided to Muwafaq. In several cases, Karavan provided the same services to Muwafaq as it did to SJRC (namely providing oversight of construction projects).

m. Saleh has been active in several charitable ventures including medical clinics, training, a sporting club, and publications. The money to fund these activities went through both Muwafaq and through his own NGO, Foundation Life Sciences. Much of the funding came directly from Yassin Kadi. During the later years, Saleh developed other sources of income other than Kadi (nfi). Some of it flowed through Karavan when the company would pay a bill or perform some kind of service for Muwafaq. Karavan would then submit a bill to Kadi and get reimbursed.

n. The last time that El Zainy spoke with Kadi was in February 2002. Prior to that El Zainy was in contact with Kadi about the blockages on several occasions. El Zainy said he was surprised that neither Kadi nor his partners in ALINTID came personally to try to resolve the situation and defend their reputations. When asked of his opinion about the charges against Kadi, El Zainy said that it was up to Kadi to defend himself and that he (El Zainy) would not judge him since he had not seen the evidence for either side of the argument.

o. El Zainy did admit that when he came on board there was virtually no barrier between Karavan's commercial activities and Kadi's charitable initiatives. El Zainy said he stopped the NGO activity in order to let the company concentrate on developing its properties. He claims to have told Kadi that if he wanted to donate money to Muslim causes, he should route it to the local Muslim community who would then have control over how it is spent. El Zainy said that some people in the organization were angry with him for doing this but he deflected them by saying that this was by the order of "the boss." (Comment: From his comments, El Zainy appears to have managed to annoy his workers because he had such exacting standards.)

Some of the previous tone of merging the two sides of the Kadi group may have also come from Wa'el Jelaidan's involvement in the organization. El Zainy had some questions about Jelaidan's ties to fundamentalist groups. When the press report came out about bin Laden mentioning Jelaidan, El Zainy asked him about the issue. Jelaidan only laughed as if it was a joke but said neither confirmed or denied it outright. El Zainy mentioned that he was surprised when Kadi suddenly announced that Jelaidan was the

boss of the Kadi entities in the region and El Zainy opined that he may have gotten the job, in part due to his close connections with the Saudi ruling family. Later, Jelaidan seemed to drop out of the picture apparently to focus on his NGO activities. (Comment: El Zainy also mentioned that Jelaidan had been the head of 1/2 Moon or Red Crescent in Pakistan at some point in his past.)

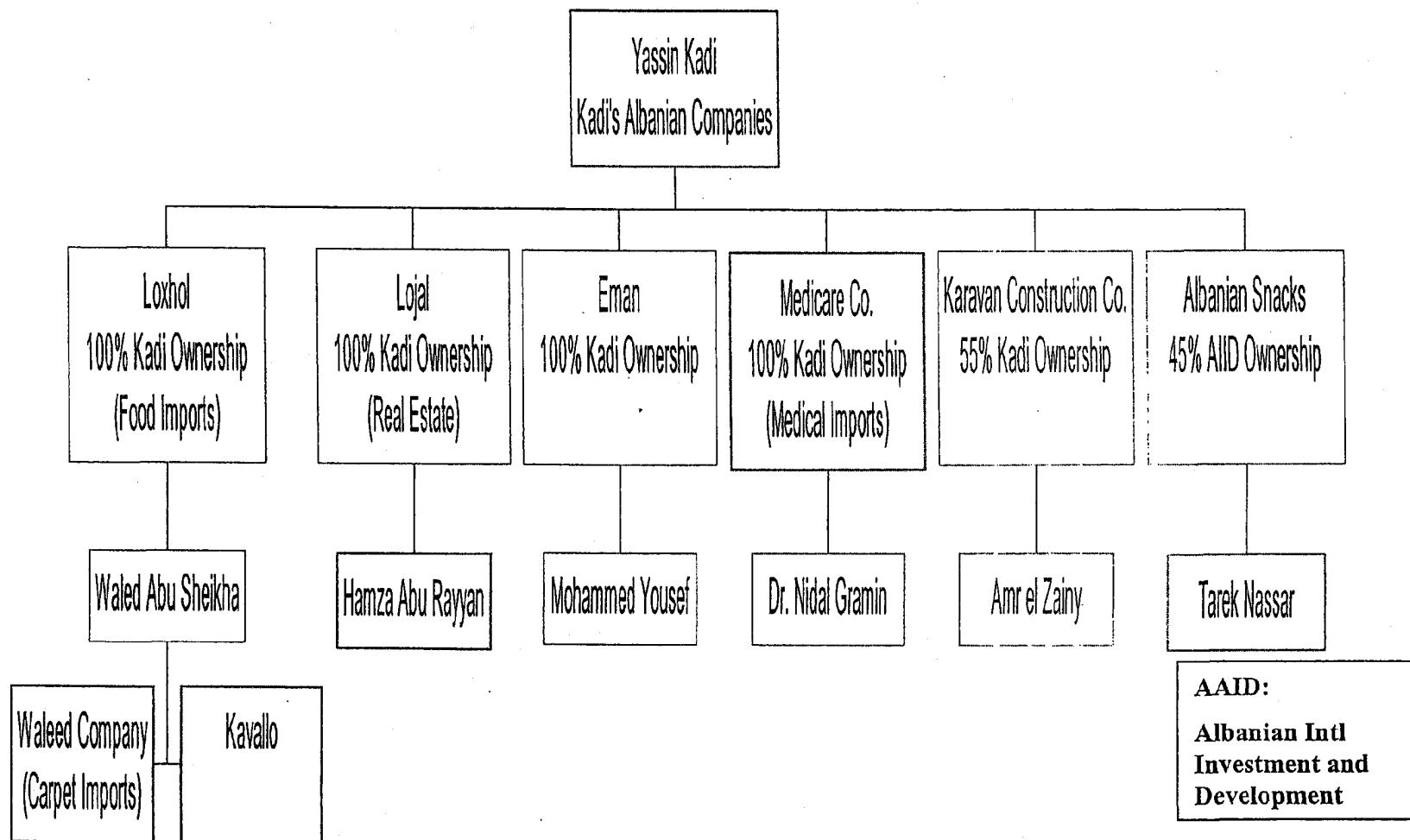
p. Tidbits:

- One area that El Zainy noted was odd about some of the Islamic--and in particular Saudi--NGOs is that they seemed to have large amounts of cash on hand. In fact they often had bags filled with currency when they moved around.
- El Zainy pointed out that, in his opinion, there are no secrets in Albania. If someone was running guns, for example, everybody would know about it soon enough.
- One of the people who met with Kadi during his 2001 visit was Ramizeki (phonetic) who is tied to the Islamic Research Institute. He was invited by Kadi while others had to reach out to arrange a meeting.
- Yusuf Ibrahim (Ismail?) left Muwafaq after it went dormant in 1997. Yusuf then left Albania for Jordan and eventually for Yemen where he worked for Kadi again. While in Yemen, Yusuf lost one of his two wives to a "gas bomb" explosion which El Zainy said was accidental. Yusuf then returned to Jordan and eventually moved on to Kosovo where is involved with some coordinating council between the NGOs and the local Muslim community, possibly WAMY (Muslim Youth).
- Yusuf and Saleh did not get along due to ego problems. Neither wanted to have to report to the other. The fighting got so bad, El Zainy said it was like dealing with children.
- After Muwafaq closed there was still some construction projects underway which El Zainy had to close down. Other activities, such as training, was taken over by Saleh. Yusuf was angry with El Zainy for finishing some of the projects on his own; Yusuf wanted them left incomplete because he thought it would reflect badly on Saleh.
- When shown a document written in Arabic which had been found in a Muwafaq file, El Zainy translated as one he wrote to the charity in 1996 about one of the mosques they were building and some concerns he had. Namely, that some of the documentation was incomplete such as whether the charity had clear title to the land (a problem in Albania).
- Kadi likes the personal touch. He will do business with people he likes as willingly as he will work with someone that has business acumen.

5. (Comment: Following the interview, El Zainy called one of the Albanian participants to pass on some suspicions he had about a particular transaction. El Zainy had been asked about whether there had been any transactions which, in light of the designation, would seem suspicious. Obviously after thinking about it for awhile, El Zainy thought the sale of 45% of Karavan to ALINTID seemed strange especially since Kadi was doing fine without them. Whether there was some other, non-business related reason for Kadi selling such a large portion of the firm, he did not know.)

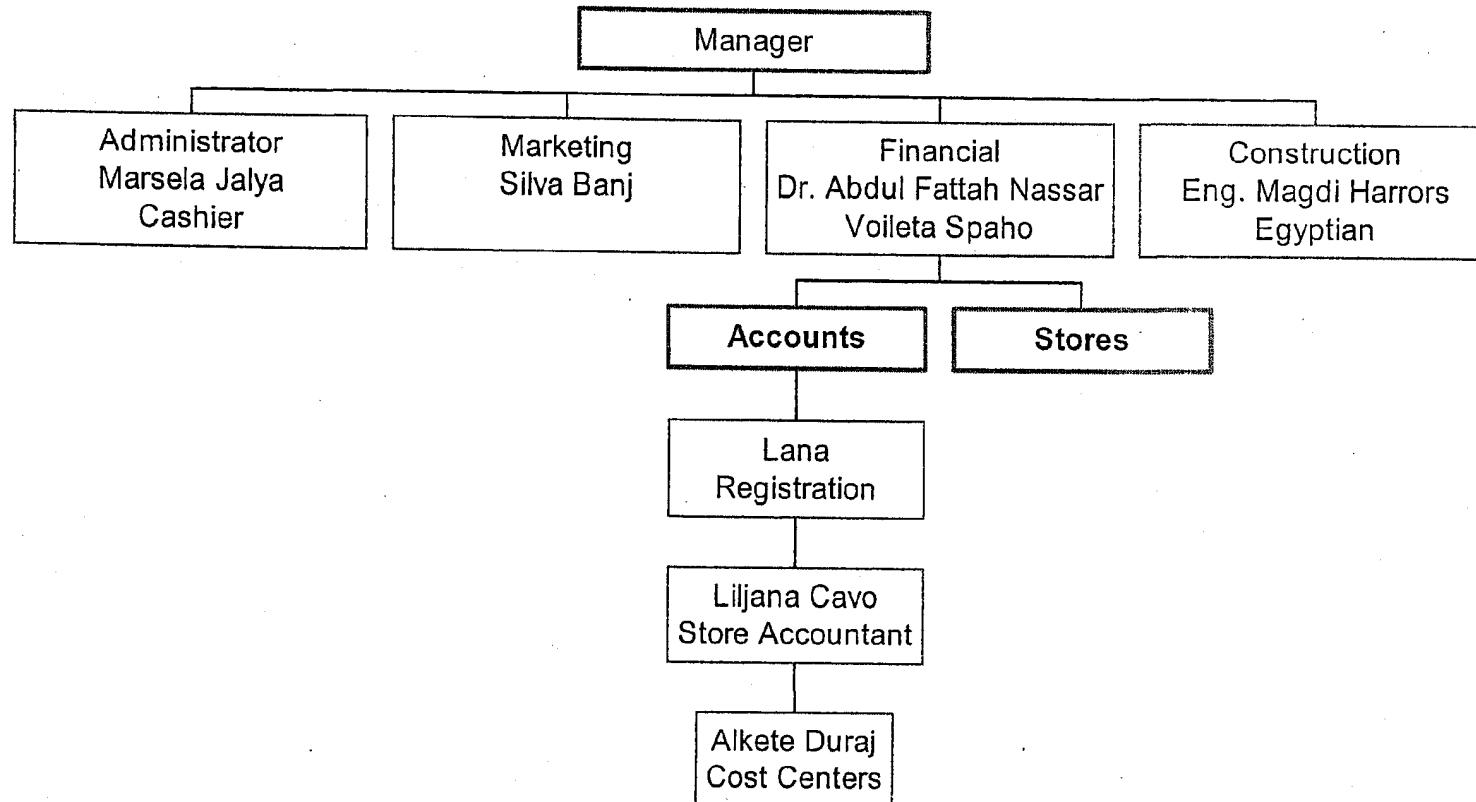
# Kadi Companies

## (Amr Al Zainy's Organizational Chart)



# Karavan Company

## (Amr Al Zainy's Organizational Chart)



Memorandum for the Record

To: [REDACTED]

Via: [REDACTED]

Via: [REDACTED]

From: [REDACTED]

Date: May 16, 2002

Subject: Interview with Former Translator/Teacher for Muwafaq.

1. The following document is classified Law Enforcement Sensitive.

2. On May 13, 2002, OFAC [REDACTED] conducted an interview with Petrit Musa, a self described former translator with the Muwafaq Foundation in Kukas, Albania. We were accompanied to this meeting with Mr. Musa by three officials of the Albanian Government who participated in the interview and also provided some translation assistance. The meeting was conducted in both English and Albanian and took place in Tirana, Albania.

3. (Comment: Muwafaq Foundation was an Islamic NGO operating in Albania during the years 1993 to 1996. It is thought that Sheik Yassin Kadi, a Saudi national, supported the Muwafaq Foundation in its efforts to build mosques and schools and run educational programs in Albania, Bosnia, Sudan, Afghanistan and other countries. Kadi is suspected of having provided support to Islamic fundamentalists in the Balkans; using the Muwafaq Foundation to fund and arm such elements. Albanian national Petrit Musa identified himself as a translator with Muwafaq from later 1993 to 1996. From records retrieved from the company's main offices in Tirana in Fall 2001, we have documents indicting that Petrit Musa was not just a translator but a key official with Muwafaq. Musa did not acknowledge this fact to us in the interview. This interview was conducted in order to him to define his role within the organization, describe his relationship with key Muwafaq and Karavan officials, and to clarify what knowledge he may have had of money being funneled Islamic fundamentalist individuals and organizations. The impression of the OFAC officers and the Albanian government officials was that Musa was evasive and not telling all that he knew about Muwafaq operations or key players involved.)

4. The following text is a record based on notes taken during the conversation. The participating OFAC and Albanian Government officials have had a chance to review the text for accuracy. This represents a true record of the meeting to the best of our recollection:

a. **Petrit Musa** graduated from the University of Tirana in 1982, with a degree from the History and Phylogeny (English) Department. Musa speaks Albanian, English and 'a little' Arabic (he claims to speak some Arabic but says that he cannot read the language). Musa worked for almost seven years as an English teacher in Golaj. In 1989, Musa was appointed the chief of the Education Department for the Kukes district, and later served for one year as the Education Director for the Has district, at a time when the Hasakas and Kukas districts were separate. Beginning in politics in 1991, Musa was elected as a Deputy to the Albanian Parliament for the first time. He served for only one year in that position. In 1992, he was 'kicked out' of his job as Education Minister of Hasakas and looked for other work.

b. In 1992, Musa met **Husan Ibrahim Tayeh**, an Arab, living in Kruma (the administrative center of Has). Tayeh was married to an Albanian woman from Kruma. Musa was the only English teacher in the town, so he would translate for Tayeh. In time, Musa asked if he could work as a translator for Tayeh.

c. At the end of 1993 (November?), Musa joined the newly opened Muwafaq office in Kukes as a translator, mainly for the Muwafaq Directors.

d. In 1994, a new Director came to this Muwafaq office. He was **Darwish Abu Sukkar**, a Jordanian. Suggar served as Muwafaq as director of both the Tirana and Kukas offices for some time. Musa dealt with the Kukas office activities; and did not interact with the Tirana office often. The activity of the Kukes Muwafaq office involved those towns in the local prefecture: Kukes, Has, and Tropoja. The Kukes Muwafaq office started small: it included the first Director (an Albanian), an Albanian engineer to oversee construction--as Muwafaq was involved in construction projects--one Arabic teacher from Jordan teaching at the school, a driver, a cleaner and himself. Later, a Jordanian who had graduated from a Romanian university came to fill the engineer's position and another Jordanian, Niyad Ahmed, came as a teacher at the madrassa. Musa then said someone else stayed for a short period, but he could only remember his first name as being Ahmed and that he was also Jordanian.

(Following Sukar, another Jordanian was named as Director of Muwafaq: Yousef al Zaid Ismail. Musa did not remember when Ismail began at Muwafaq, but knew that Ismail left Muwafaq in 1997, during the time of the general uprising in Albania. Both the Kukes and Tirana Muwafaq offices ceased activity at this time. Musa left his position with Muwafaq in 1996).

e. Musa first spoke of **Abu Sukar**, his director at Muwafaq. Abu Sukkar had set the general financial procedures for Muwafaq, which included the bringing of funds from Tirana to Kukes. Musa said that the main financier (chief financial officer) of Muwafaq in Kukes was an old man, a local Albanian - **Lutfi Kerpacı**. Musa said he did not know who was the financier of the Tirana Muwafaq office. No outside financial audits were ever conducted concerning the Muwafaq offices, as far as Musa knew.

Sukar and the others bought houses in Kukes when they first arrived: one was for the Muwafaq office, the others were to be used by teachers to be brought from abroad. Musa first said that Abu Sukar rented his own house in the area and did not own one himself (but then later said that one of the houses was for the Director). Those houses now have been just taken by the locals in the area, following the closing of Muwafaq (1996/1997).

In addition to financial matters, Abu Sukar was the one who organized everything in Muwafaq: organization for the office, the setting of bank accounts, beginning construction projects, etc.

f. At some point, the local Muslim community in Kukes asked Muwafaq to help financially support the madrassa (a local religious school), connected with the Kukes mosque. Muwafaq paid the bills, teachers salaries, etc. The curriculum at the school was in complete accord with the law for private schools. English and Arabic were taught, as well as Islamic culture. (Later, in 1996, this school was closed, as its license was not renewed by the government).

g. Muwafaq's Albanian employees were paid in cash using Leks, according to Musa. He did not know how the Arabs were paid. Musa received a salary of 30,000 Leks per month; others in the office (drivers, cleaners) received less. The teachers at the Madrassa were paid a regular Albanian teachers salary plus 2000 Leks (later 3000 Leks) extra, above what would normally be paid at a government school.

h. While with Muwafaq, Musa said that he would translate for the Director - not documents, but only conversations with contractors, the Director's contacts with the local government, etc. Musa would also travel with the Director to translate meetings with local people, translating English to Albanian and the reverse. Musa said that both Directors spoke and used English ('but Sukar just very little'). Musa claims that he only translated conversations; he did not translate any government documents and never became involved in the planning or implementing of Muwafaq projects. He also claims that he had little knowledge of such details, as he was just a translator. (However, later he admitted that he did some written translation in completing local building permits for the projects and did some financial/banking translations).

i. Muwafaq projects included the building of some mosques and a school, which was done jointly with the local community; another project was a food distribution program for the poor. To the best of Musa's recollection, nine or ten projects were completed. All these were solely Muwafaq projects (no other NGOs involved) that were undertaken with input from the Muslim community, Muwafaq and the local government. These projects were paid for by checks, after contracts were signed. The projects were undertaken by local Albanian architects/engineers/contractors. A local Kukes bank (first, The National Commercial Bank of Albania; later The Savings Bank of Albania) was used by Muwafaq's Kukes office for small cash transactions. Musa said that these accounts were already established when he arrived in 1993. The money was carried in cash from Tirana to Kukes to pay for these projects/pay salaries etc. It was done this way because having the banks do the transfer would take ages; each trip would entail the movement of the equivalent of \$1,000-1,500.

j. Musa continued by explaining how he knew **Abdul Latif Saleh**. Musa said that Saleh was not directly related to the Muwafaq Foundation in Tirana, but Musa knew that Saleh had some sort of relationship with Muwafaq. The Muwafaq Directors and Saleh would have meetings. Musa said that his understanding was that Saleh had work in Albania in cooperation with the Albanian government, on projects such as the reconstruction of the main clinic. Also, Musa said that he thought that Saleh was also involved with some state 'official' work, possibly through the Minister of Health, as a coordinator or an administrator. Musa said that Saleh is well known in Tirana and all over Albania, and Musa understood that Saleh had been granted Albanian citizenship. When pushed, Musa said that Saleh was connected to the construction of the Kukes madrassa and also undertook the publishing of some calendars and diaries under the aegis of his NGO FLS. In one or two cases, Musa said that Saleh gave money to the school. During the troubles in March/April 1997, the school was destroyed and there was then no money to pay the teachers. Musa thought that Saleh paid the teachers salaries at that time.

k. Concerning **Wa'el Jeliadan**, Musa claims to have no knowledge of him. (An Albanian government official then explained to Musa, in Albanian, who is Jeliadan, to push his memory). Musa again denied knowing him directly or knowing of him by reputation. Musa reiterated that, as only a translator in Kukas (sp?), he would not be privileged to know about many things or people. He also mentioned that during the Kosova crisis and the war, many Arabs and others from all over the Muslim world came in and out of Kukas: journalists, humanitarian, etc. He said that he could not know them all.

l. Musa then explained how he knew **Sheik Yassin Kadi**. Musa met Kadi twice. The first occasion was in 1994 (or 1995), when Kadi came to Albania. Musa met him in Kukes while he was working for Muwafaq at the time. Musa was asked to organize a lunch for Kadi with local dignitaries from Kukes and the surrounding towns. Derwish Sukar took Kadi around the region on this trip, with also possibly Abdel Latif Saleh. The second time Musa met Kadi was last year (2001) in Tirana. Musa met with Kadi at the end of the day during this trip, so that he could ask for Kadi's help in funding a new NGO called "Revival." The two men talked but Musa said that the conversation did not produce any concrete results for Musa. (Comment: From the interview with Amr El Zainy, we found out that Petrit Musa, Ramiz Zekaj, and Sulejman Celiezi met separately with Kadi and the Rogner Hotel.) Musa later explained that in 1994, he

had attended a UNDP workshop in Tirana and became interested in registering his own Albanian NGO in the future. Musa worked with a group of friends on this issue. In March 1996, Musa registered 'Revival' in Kukes. The NGO was approved by the court as a cultural association and was involved in small projects. One idea was the creation of an Internet Service Provider for the Kukes area. Another was founding small libraries with money from the Soros Foundation. The organization never really took off, however, and it is now defunct.

m. Musa initially said that Kadi did not financially fund Muwafaq construction projects directly, nor did Karavan. But, in his next sentence, Musa then did remember that following the departure of the Jordanian engineer from Muwafaq to a position with Karavan, projects were then given to Karavan. Musa said he had no knowledge of funds coming from Kadi either by check or cash. Musa said that he never saw money moving through Muwafaq and doesn't know where money was coming from or what were the sources of money.

n. Musa was questioned directly, that as such an important person (having met Kadi twice, knowing Salah), why he did he know surprisingly little. Musa just laughed and said that he did not know.

o. Musa also mentioned that Muwafaq sponsored two teachers of Islamic culture from Kosovo; the phonetic for one of the men was "Eilasah Merparicdi." He also mentioned that there is a group of young men associated with the Kukes mosque who hold some pretty radical views and have made trouble for the students of the madrassa and the community. They appeared around 1997 when Muwafaq went dormant and have been a fixture of the Muslim community ever since. They do not seem organized or under any specific direction, but Musa opined that they must get funds from somewhere as they did not have any apparent source of income. In Musa's opinion, they were getting help from some other Islamic, Albanian, or Arab NGO. He went on to say that some may have traveled secretly out of Albania to receive training with others providing help with travel and visa arrangements. In his opinion, this "damaged" them mentally and made them "dangerous" to the community since they seemed to hate everybody and everything (including teaching English). Their main arena of activity was the Kukes mosque. When asked directly, Musa said he was not aware of any Arabs or other outsiders being involved with them.

p. The madrassa was effectively abandoned during the 1997 troubles and is now derelict. The Muslim community applied to Kadi to get title to the building. Kadi was concerned to what use they would put the building as he was certain that anything negative would reflect badly on him. Kadi specifically said he did not want the school to fall into the hands of NGOs such as Al Harimain, Waqf, and a couple of others (nfi).

q. When asked about his opinion of Saleh, Kadi, and others that he worked with, Musa said he thought they were good people and good Muslims.

5. (Comment: Two days after the meeting, one of the Albanian participants provided information from a contact that stated that Musa may have worked in 1992 in the Kukes area for the NGO Al Harimain [phonetic]. He also is reported to have ties to the former Kukes Imam, Salim Tota, who now preaches at the D. Hoxha mosque in Tirana. This mosque is known locally as a center for "extremist" Muslims.)

MEMORANDUM FOR THE RECORD

To: [REDACTED]

Via: [REDACTED]

Via: [REDACTED]

From: [REDACTED]

Date: May 19, 2002

Subject: Follow-up Interview with Former Translator/Teacher for Muwafaq.

1. The following document is classified Law Enforcement Sensitive.
2. On May 16, 2002, OFAC [REDACTED] conducted a second interview with Petrit Musa, a self-described former translator with the Muwafaq Foundation in Kukas, Albania who is now an official with Albania's Foreign Ministry. We were accompanied to this meeting with Mr. Musa by three officials of the Albanian Government who participated in the interview and also provided some translation assistance. The meeting was conducted in both English and Albanian and took place in Tirana, Albania.
3. (Comment: Documents reviewed by the OFAC team both before and after the initial interview with Musa indicated that he may not have provided completely truthful responses to some questions. While Musa claimed that he was nothing more than a local translator who handled verbal as well as some written translations of English into Albanian and vice versa, documents discovered among the Karavan holdings of the Albanian government indicated that he operated as "director general" of the Islamic NGO tied to Saudi financier Sheikh Yassin Kadi, Muwafaq Foundation. In his role as "director general", he apparently had the power to sign contracts and transfer money which he did not admit to during the first interview. This, his evasive manner during the first session, and possible new derogatory information about him prompted both the Albanian officials and the OFAC team to call him in for a second attempt to elicit the truth. The derogatory information, provided by Albanian officials, indicated that Musa was believed to have been a contact or member of the Islamic NGO Al Harimain in the early 1990s in Kukes. Musa was also believed to have ties to the former Kukes Muslim Imam Selim Tota. Tota now preaches at the D. Hoxha Mosque in Tirana which the Albanian officials view as a center for extremist Muslim activities. Biographic information released on Musa is that he has two brothers still in Kukes--Mus, a businessman, and Dritan, a police officer.)

4. The following text is a record based on notes taken during the conversation. The participating OFAC and Albanian Government officials have had a chance to review the text for accuracy. This represents a true record of the meeting to the best of our recollection:

a. The meeting began with a long discussion/argument between Musa and the Albanian officials who wanted him to sign a statement swearing that everything he was going to tell us that day was the truth. He objected to some of the wording of the statement and after some back-and-forth, agreed to sign it with some changes. After that was finished, a review was done of some of his comments about the Muwafaq office in Kukes. Musa was then confronted with the opinions of the officials from both governments present in the room with him that he had not been truthful in his original statements. An example was cited that he had told us that he was nothing more than a translator which he agreed he did. He was then shown an Arabic-language document with his signature along with an Albanian-language document (a contract) with another of his signatures in the space meant for Yusuf Ismail's, the director general of record. Musa stated that he signed "in the presence of" Ismail although he could not explain why the organization's director would allow a translator to sign for him when he was in the same room. Musa then went on to say that maybe he (Musa) just didn't take this document very seriously. When told that we possessed numerous documents signed by him on behalf of Muwafaq, Musa then said that "they asked me many times to do this...to sign documents which were related to Kukes activity."

The discussion over the next 2.5 hours frequently returned to the presence of Musa's name on Muwafaq documents. According to his earlier description of his role in the organization, this should have been outside of his purview. Moreover, he signed his name on several forms in the space provided for the Director General including on one handwritten document where he added the title to his name. Elsewhere, he called himself "coordinator."

The first few times he was confronted with this, Musa claimed that (1) he did not take it seriously and (2) "they" wanted him to sign for Muwafaq on documents dealing with the foundation's projects because he was the only one in Kukes. Since his was the only face people saw, they started referring to him as "director." He initially claimed that he only signed as a local witness until he was shown about a half dozen documents with his signature as described above. Then he said maybe he was incorrect in the way he did it.

Musa was about to launch into a long explanation about procedural matters until one of the Albanian officials interrupted him to say that we were not interested in procedures but in Musa's apparent status as a senior official in the foundation rather than "simply a translator." Another participant then added that at the onset of the interview, Musa had crossed out something he did not like on the statement committing him to tell the truth: he was then asked why he was not so scrupulous on these documents. He says he should have been.

Musa was then told that neither government was after him so he should not take it personally. All he had to do was to be truthful and come clean as we were all after a bigger fish outside of Albania. Musa then said he had tried his best to help us. The response was we did not believe him. While it was emphasized that we were not impinging on the charitable work he did and his motivations, it was our view that he had to know something about the illicit activities of the organization in that region during the time he was there. He countered by saying that he never did anything to harm anyone or the state.

b. Another document presented to Musa was explained as being related to a lawsuit brought against him by a number of teachers at the Kukes madrassa who had not been paid in some time and had come to believe that Musa was pocketing their Muwafaq pay supplements. The suit went to court and Musa won; he eventually was able to get Dr. Abdul Latif Saleh, who had agreed awhile before to support the Muslim community in Kukes, to pay the arrears.

c. Musa declared he had been the school coordinator during the last meeting. The school itself had been started by the local Muslim community on its own and they later came to Muwafaq for help in running it. Musa was quite firm that this was not exclusively a religious school but conformed to Albanian laws on private education with religious culture only taking up about 13% of a student's curriculum. He went on to

claim that it became one of the top schools in Albania and it produced some of the best students. He noted that he worked with FLS (Foundation Life Sciences) people in handling the school's expenses (such as food and school supplies) and submitting the appropriate forms back to Tirana. Each expense voucher had to have the signature of upward of 5 people on it including the accountant, the purchaser, the storekeeper who sold it, Musa's and finally the responsible FLS person. Musa said it was the same even if the purchase was even for a single pencil. At the end of each month, a summary of the school's expenses would be sent back to Tirana along with a sheaf of vouchers. Musa said he handled about \$2,000 per month. Later, he was shown his signature on two payment receipts for USD 5,000 and 10,000 with no other corresponding names as was the case for the minor expenditures.

d. The discussion then switched gears as Musa was asked about his possible ties to Al Harimain. He denied ever having any contact with them officially or acting on their behalf unofficially. Musa also reiterated from the previous meeting Yassin Kadi's words from his meeting with Musa in April 2001 that he did not want, whatever happened, for the school to fall into the hands of Al Harimain. Musa opined that Kadi knew Al Harimain's philosophy and how it operated. Musa then said he found their people very difficult to deal with in Kukes when they showed up during the Kosovo crisis. They weren't the biggest operation with only a shop and possibly one house under their control. He did not like the way they dressed, the way they thought, how they surrounded themselves with uneducated people, and the way they created problems. They brought food (rice) and blankets up to Kukes for distribution. Musa noted that their method of distribution left something to be desired. The Al Harimain people did not seem interested in working with anyone else in trying to get aid to those who really needed it. Essentially--according to Musa--they showed up with trucks of stuff and would hand it out to whoever happened to show up. Meanwhile, one of their number took lots of pictures to document their "great" work. They would then disappear. Musa said this undermined real aid work because some people would jump from line to line (Harimain was not the only organization to come to Kukes and operate in this manner) getting more than they needed while others went short.

Musa also seemed rankled that Al Harimain reps--particularly the main person who was called both "Doctor" and "Dr. Abu (Imu)"--would not interact with the other agencies. Musa knew about this because he became a coordinator between the UAE government-run refugee camp in Kukes (for some 13,000 Kosovars) and a number of the locally-based NGOs as a favor to the prefect of the Kukes area who was a friend of Musa's. (Comment: As an aside, Musa said that if one asked the people of Kukes who Petrit Musa was, they would say he "is chief of all the Arabs.") He volunteered for this on his own as Muwafaq was gone by this time. During the meetings held between the various NGOs and the UNHCR, Al Harimain's people were nowhere in evidence, according to Musa. (Comment: One of the Albanian representatives later noted that one of the payment summaries contained a name that appeared to match that of a known Al Harimain supporter. Following the meeting, another Albanian official promised to investigate this to see if this was, indeed, a match.)

e. Besides the school, Muwafaq was also involved in construction of mosques. Only about ten such projects were undertaken during Muwafaq's existence. (Comment: One Albanian contact the OFAC team spoke to estimated that during the 1990s, Islamic NGOs built or rehabilitated 300 mosques in Albania.) None of these Muwafaq projects amounted to very much in terms of total dollars spent, according to Musa. He thought that the most expensive one did not cost more than USD 12,000. By the time Muwafaq closed, Musa thinks they had spent something on the order of USD 200,000.

f. Muwafaq basically walked away from the school around 1997. This was because, during the 1997 troubles, the school had been looted and virtually destroyed. Some teachers and others got it running on their own enough to complete the current class (up to 1999) with some help from local residents who replaced some of the missing doors and windows. After that the school closed for good because the government did not renew its license. At present, the only staff still on duty are some guards who have not been paid for their efforts in a long time. Musa also indicated that Selim Tota, the former imam of Kukes who now preaches at Tirana most radical mosque, was involved with the school at some point.

g. With Muwafaq's demise, Musa started his own NGO "Revival" which never really got off the ground. Musa said he wanted to something that would help the community more than the building of a mosque. He noted that during Muwafaq's existence he wanted the foundation to tackle something more beneficial for the community like laying water pipes (which would have cost USD 2,000 or one-sixth of a mosque) or rebuilding roads. Musa's personal goals were to create real libraries that actually had books as well as bring the Internet to Kukes.

h. When asked if he had had any contact or support from Dr. Abdul Latif Saleh since he was kicked out of the country, Musa said no. When asked if he knew whether Saleh had ever worked with or been in contact with Al Harimain, the reply was no. When asked if he knew anything about Saleh's dealings and contact with Wa'el Jelaidan, the reply was no. When asked if Musa himself had dealt with Jelaidan, again the reply was no. Finally, when asked if he had dealings with any other Kadi companies or individuals other than Karavan, Musa answered no.

i. Interestingly enough, Musa made mention that he loaned one of his brothers, a businessman in Kukes, USD 7,000 around 1998 which he only recently paid back (Comment: We wondered later how Musa could have gotten hold of that much cash.).

5. Comment: Despite repeated attempts by both the US and Albanian officials during the meetings to get more satisfactory answers from Musa, the consensus was that he was not being forthcoming. His answers often seemed evasive or dissembling. We cannot say with any certainty to what extent he may have had knowledge of Muwafaq providing support to Islamic fundamentalists. Even the Albanian officials consider him a tough nut to crack. One opinion put forth was that Musa may be trying to hide the fact that he skimmed off funds meant for the school (see 4(b) and 4(i) for further information). Another is that he really is tied to extremist circles (see 4(d) and 4(f) for further information).

At this point, due to the lack of time left during this TDY and the lack of additional information that could be used to confront Musa about his statements, a third interview is not planned.

| ID # | Company | Year  | Type of Records | Sub Number | \$ Amt  | Notes                           | Other Notes                      |
|------|---------|-------|-----------------|------------|---------|---------------------------------|----------------------------------|
| 1.1  | LoxHall | 93-94 | A/P             | 1.101      | 330,000 | Bluej Objekt Lokeh/2            |                                  |
| 1.2  | LoxHall | 93-94 | A/P             | 1.201      | 395,000 | Lox Hall/1                      |                                  |
|      |         |       |                 | 1.202      | 84,000  | Inter. Islamic Charitable Org/1 |                                  |
|      |         |       |                 | 1.203      | 35,000  | Dr. Saleh/1                     |                                  |
|      |         |       |                 | 1.204      | 5,000   | Dr. Saleh/1                     |                                  |
| 1.3  | LoxHall | 95    | A/P             | 1.301      | 700K Lk | Muwafak/1                       |                                  |
|      |         |       |                 | 1.302      | 700,000 | Lox Hall/1                      |                                  |
| 1.4  | LoxHall | 96    | A/P             | 1.400      | N/A     | Work Sheet/1                    |                                  |
|      |         |       |                 | 1.401      | 10,750  | Yassin Qadi/2                   |                                  |
|      |         |       |                 | 1.402      | 100,000 | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.403      | 70,000  | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.404      | 30,000  | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.405      | 100,000 | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.406      | 50,000  | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.407      | 230,000 | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.408      | 100,000 | Banka Islamic/1                 |                                  |
|      |         |       |                 | 1.409      | 70,000  | Banka Islamic/1                 |                                  |
|      |         |       |                 | 1.411      | 30,000  | Banka Islamic/1                 |                                  |
|      |         |       |                 | 1.412      | 100,000 | Banka Islamic/1                 |                                  |
|      |         |       |                 | 1.413      | 230,000 | Banka Islamic/1                 |                                  |
|      |         |       |                 | 1.414      | 50,000  | Banka Islamic/1                 |                                  |
|      |         |       |                 | 1.415      | 75,000  | Banka Islamic/1                 |                                  |
|      |         |       |                 | 1.416      | 75,000  | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.417      | 100,000 | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.418      | 100,000 | Banka Islamic/1                 |                                  |
|      |         |       |                 | 1.419      | 170,000 | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.420      | 19,870  | Waleed Company/1                |                                  |
| 1.5  | LoxHall | 95    | A/P             | 1.501      | 60,000  | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.502      | 100,000 | Yassin Qadi/1                   |                                  |
|      |         |       |                 | 1.503      | 400,000 | Yassin Qadi/1                   |                                  |
| 1.6  | LoxHall | Var   | G/Ls            | 1.601      |         | Honey Account/1                 | Arabic Translation Needed.       |
|      |         |       |                 | 1.602      |         | YA Kadi Current Account/1       | Should be a priority for Transl. |
|      |         |       |                 | 1.603      |         | Sh. Yassin A. Kadi/2            | After Trans may need addts.      |
| 1.7  | Karavan | 95    | Vouchers        | 1.701      |         | Loxhall/2                       |                                  |
|      |         |       |                 | 1.702      |         | Loxhall/Stapled Pack            |                                  |
|      |         |       |                 | 1.703      |         | Sh. Yassin Kadi/1               |                                  |
|      |         |       |                 | 1.704      |         | Sh. Yassin Kadi/1               |                                  |
|      |         |       |                 | 1.705      |         | Sh Yassin Kadi-LoxHall/1        |                                  |
|      |         |       |                 | 1.706      |         | Sh Yassin Kadi-LoxHall/1        |                                  |
|      |         |       |                 | 1.707      |         | Lox Hall/1                      |                                  |
|      |         |       |                 | 1.708      |         | Lox Hall/1                      |                                  |
|      |         |       |                 | 1.709      |         | Lox Hall-Notes to Fins/1        |                                  |
|      |         |       |                 | 1.710      |         | Lox Hall-Notes to Fins/1        |                                  |
|      |         |       |                 | 1.711      |         | Notes to fins/1                 |                                  |
|      |         |       |                 | 1.712      |         | Consolidations/1                |                                  |
| 1.8  | Karavan | 96    | Payroll         | Nothing    |         |                                 |                                  |

|     |           |            |      |        |  |   |
|-----|-----------|------------|------|--------|--|---|
| 1.9 | Karavan   | 97         | L/Cs | 1.901  | Arabic/1   | Arabic Translation Needed                           |
|     |           |            |      | 1.902  | Arabic/2   | Same as 1.901                                       |
|     |           |            |      | 1.903  | Dev of Owners Equity/1                                     |   |
|     |           |            |      | 1.904  | Notes on Owners Eq/1                                       |   |
|     |           |            |      | 1.905  | Financial Info/1   |   |
|     |           |            |      | 1.906  | Financial Info/1   |   |
|     |           |            |      | 1.9061 | Sugar Shipment/Morabah Account/4                           |   |
|     |           |            |      | 1.907  | Proposal of Reloc of Cos/1                                 |   |
|     |           |            |      | 1.908  | Proposal of Reloc of Cos/1                                 |   |
|     |           |            |      | 1.909  | Falsal Fin/1   |   |
|     |           |            |      | 1.91   | Payments/1   |   |
|     |           |            |      | 1.9101 | Falsal Fin Letter of Understanding for Sugar/10            |   |
|     |           |            |      | 1.9102 | AAIB Loks Holl Statement of Account/16                     | A/C #201 01 40 01 100101 7                          |
|     |           |            |      | 1.9102 | Loks Holl Faisal Finance Account/34                        |   |
|     |           |            |      | 1.9103 | Brazilian Sugar/6  |   |
|     |           |            |      | 1.911  | Arabic Lang Sched/1  |   |
| 2.1 | Karavan   | 97         |      | 2.101  | 5000 Loks Holl Journal Entry \$5000/2                      |   |
|     |           |            |      | 2.102  | 5000 Journal Entry Note \$5000/4                           |   |
|     |           |            |      | 2.103  | 5000 Loks Holl Journal Entry \$5000/3                      |   |
|     |           |            |      | 2.104  | 2000 Loks Holl Journal Entry \$2000/3                      |   |
|     |           |            |      | 2.105  | 2000 Loks Holl Journal Entry \$2000/2                      |   |
|     |           |            |      | 2.106  | 10000 Loks Holl Journal Entry \$10000/2                    |   |
|     |           |            |      | 2.107  | 10000 Loks Holl Journal Entry \$10000/3                    |   |
|     |           |            |      | 2.108  | 9000 Loks Holl Journal Entry \$9000/2                      |   |
|     |           |            |      | 2.109  | 1000 Loks Holl Journal Entry \$1000/2                      |   |
|     |           |            |      | 2.11   | 3000 Loks Holl Journal Entry \$3000/2                      |   |
|     |           |            |      | 2.111  | 10000 Loks Holl Journal Entry \$10000/2                    |   |
|     |           |            |      | 2.112  | 2000 Loks Holl Journal Entry \$2000/2                      |   |
|     |           |            |      | 2.113  | 500 Loks Holl Journal Entry \$500/2                        |   |
|     |           |            |      | 2.114  | 1000 Loks Holl Journal Entry \$1000/2                      |   |
|     |           |            |      | 2.115  | 500 Loks Holl Journal Entry \$500/2                        |   |
|     |           |            |      | 2.116  | 1000 Loks Holl Journal Entry \$1000/2                      |   |
|     |           |            |      | 2.117  | 1000 Loks Holl Journal Entry \$1000/2                      |   |
|     |           |            |      | 2.118  | 1000 Loks Holl Journal Entry \$1000/2                      |   |
|     |           |            |      | 2.119  | 30000 Loks Holl Journal Entry \$30000/2                    |   |
|     |           |            |      | 2.12   | 9500 Loks Holl Journal Entry \$9500/2                      |   |
|     |           |            |      | 2.121  | 1500 Loks Holl Journal Entry \$1500/2                      |   |
|     |           |            |      | 2.122  | 5000 Loks Holl Journal Entry \$5000/2                      |   |
|     |           |            |      | 2.123  | 4000 Loks Holl Journal Entry \$4000/2                      |   |
|     |           |            |      | 2.124  | 10000 Loks Holl Journal Entry \$10000/2                    |   |
| 2.2 | Loks Holl | 97         |      | 2.201  | Financial Fax from Saleh to al Zainy, Qadi, Sayed, Naser/1 |   |
|     |           |            |      | 2.202  | Management Agreement/7                                     |   |
|     |           |            |      | 2.203  | Mexico Sugar Fax from Syed to Sheikha/Nassar/1             |   |
|     |           |            |      | 2.204  | Yemen Sugar Fax Syed to Sheikha, Saleh, Nassar/2           |   |
|     |           |            |      | 2.203  | Lateef Signature Forged/2                                  |   |
|     |           |            |      | 2.204  | Kadi Fax Albanian Properties/2                             |   |
|     |           |            |      | 2.205  | Letter to Kadi/From Masood Syed                            | cced: Lateef Saleh, Abdul Fatah Nassar, Abu Sheikha |
|     |           |            |      | 2.206  | Fax from Syed Re: properties in Albania                    | cced: Lateef Saleh, Abdul Fatah Nassar, Abu Sheikha |
| 2.3 | Karavan   | 12/08/1997 |      | 2.301  | 120000 Journal Entry/Internal Transfer \$120000/2          | AAIB A/C #100347                                    |
|     |           | 12/01/1997 |      | 2.302  | 120000 Journal Entry/Internal Transfer \$120000/2          | AAIB A/C #100347                                    |

|     |            |            |        |  |  |   |  |
|-----|------------|------------|--------|--|--|---|--|
|     | 10/17/1997 | 2.303      | 100000 | Journal Entry \$5701.17/Internal Transfer \$100000/2       | AAIB A/C #100347                           |   |  |
|     | 11/05/1997 | 2.304      | 100000 | Journal Entry/Internal Transfer \$100000/2                 | AAIB A/C #100347                           |   |  |
|     | 10/17/1997 | 2.305      | 100000 | Journal Entry/Internal Transfer \$100000/3                 | AAIB A/C #100347                           |   |  |
|     | 07/04/1997 | 2.306      | 300000 | Journal Entry/Internal Transfer \$300000/2                 | AAIB A/C #100347 (may be same as 2.308)    |   |  |
|     | 06/12/1997 | 2.307      | 200000 | Journal Entry/Internal Transfer \$200000/2                 | AAIB A/C #100347                           |   |  |
|     | 07/16/1997 | 2.308      | 300000 | Journal Entry/Internal Transfer \$300000/2                 | AAIB A/C #100347 (may be same as 2.306)    |   |  |
|     | 09/16/1997 | 2.309      | 100000 | Journal Entry/Internal Transfer \$100000/2                 | AAIB A/C #100347                           |   |  |
|     | 08/20/1997 | 2.31       | 20000  | Journal Entry/Cash \$20000/4                               | AAIB A/C #100347                           |   |  |
| 2.4 | Karavan    | 12/23/1997 | 2.401  | 100  | Payment Voucher Mowafaq Foundation \$100/3 | AAIB A/C #100347  |  |
| 2.5 | Karavan    | 12/17/1997 | 2.501  | 10000  | Exchange for Cash \$10000/2                | AAIB A/C #100347 Plus summary of all exchanges for 1997 |  |
|     | 11/06/1997 | 2.502      | 10000  | Exchange for Cash \$10000/2                                | AAIB A/C #100347                           |   |  |
|     | 12/11/1997 | 2.5021     | 10000  | Exchange for Cash \$10000/2                                | AAIB A/C #100347                           |   |  |
|     | 12/02/1997 | 2.5022     | 1000   | Exchange for Cash \$1000/2                                 | AAIB A/C #100347                           |   |  |
|     | 11/05/1997 | 2.503      | 10000  | Exchange for Cash \$10000/2                                | AAIB A/C #100347                           |   |  |
|     | 10/28/1997 | 2.504      | 10000  | Exchange for Cash \$10000/2                                | AAIB A/C #100347                           |   |  |
|     |            | 2.505      | 10000  | Exchange for Cash \$10000/2                                | AAIB A/C #100347                           |   |  |
| 2.6 | (multi)    | 99         | 2.601  | Qadi AAIB Acct Info, Signing Authority/2                   |  |   |  |
|     |            |            | 2.602  | Alintid/1  | Arabic Translation Needed                  |   |  |
|     |            |            | 2.603  | /1   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.604  | Alintid/3  | Arabic Translation Needed                  |   |  |
|     |            |            | 2.605  | /1   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.606  | Intl Islamic Charitable Org/2                              | Arabic Translation Needed                  |   |  |
|     |            |            | 2.607  | Personnel Info/2   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.608  | /1   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.609  | /2   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.61   | /2   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.611  | /1   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.612  | /1   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.613  | /1   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.614  | Fax from Loks Holl/1                                       | Arabic Translation Needed                  |   |  |
|     | 06/25/1996 |            | 2.615  | Fax from Panasonic   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.616  | Letter from Muwafaq Foundation/2                           | Arabic Translation Needed                  |   |  |
|     |            |            | 2.617  | Fax from Qada  | Arabic Translation Needed                  |   |  |
|     | 05/23/1996 |            | 2.618  | IICO Certificate   | Arabic Translation Needed                  |   |  |
|     |            |            | 2.619  | Qadi Delegation Visit Itinerary                            |  |   |  |
|     | 03/02/1996 |            | 2.62   | /1   | Arabic Translation Needed                  |   |  |
|     | 01/27/1996 |            | 2.621  | Letter from Muwafaq Foundation/1                           | Arabic Translation Needed                  |   |  |
|     |            |            | 2.622  | Fax from Qadi/Syed ("Internal recording thru J. Entries")? |  |   |  |
| 2.7 | Karavan    | 12/02/1998 | 2.701  | Travel Expense to Bulgaria by Violeta Spaho/2              |  |   |  |
|     | 12/17/1998 | 2.702      | 10000  | Exchange for Cash \$10000/3                                | Ref to AAIB acct # 100347                  |   |  |
|     | 12/15/1998 | 2.703      | 5000   | Exchange for Cash \$5000/2                                 |  |   |  |
|     | 12/10/1998 | 2.704      | 10000  | Exchange for Cash \$10000/2                                | Drawn on Intl Commercial Bank              |   |  |
|     | 12/09/1998 | 2.705      | 19000  | Exchange \$19000/1   |  |   |  |
|     | 12/07/1998 | 2.706      | 10000  | "Payment for armed doors and downpayment" \$10000/1        | Drawn on Intl Commercial Bank              |   |  |
|     | 12/02/1998 | 2.707      | 5000   | Exchange and Deposit in Bank \$5000/1                      | Ref to A/C #100347                         |   |  |
|     |            | 2.708      | 5000   | Exchange \$5000/2  |  |   |  |
| 2.8 | Karavan    | 11/27/1998 | 2.801  | 5000   | Exchange for Cash \$5000/3                 | Drawn on Intl Commercial Bank                           |  |
|     | 10/23/1998 | 2.802      | 8000   | Paid to CAFO (for what?) \$8000/1                          | Written in Arabic/Needs Translation        |   |  |
|     | 10/22/1998 | 2.803      | 10000  | Exchange for Cash \$10000/1                                | Drawn on Intl Commercial Bank              |   |  |
|     | 10/13/1998 | 2.804      | 10000  | Exchange and Deposit in IIBP \$10000/2                     | "Deposit" written in different ink         |   |  |

|     |            |            |       |                     |  |
|-----|------------|------------|-------|---------------------|--|
|     | 10/09/1998 | 2.805      | 10000 | Exchange for Cash/3 | Drawn on Int'l Commercial Bank                             |
| 2.9 | Karavan    | 02/26/1999 | 2.901 | 30000               | \$25000 deposit in bank, \$5000 for exchange/4             |
|     |            | 02/18/1999 | 2.902 | 150000              | Out-going transfer Alintid via NCB Jeddah/5                |
|     |            | 01/09/1999 | 2.903 | 150000              | 5 \$30000 Transactions Exchange for Cash 1/6-9/1999/11     |
|     |            |            |       |                     | Drawn on Int'l Commercial Bank                             |
| 3.1 | Karavan    | 05/27/1999 | 3.101 | 350000              | (Contribution); Pay back capital to Qadi; Pay A/P/6        |
|     |            | 05/03/1999 | 3.102 | 350200              | Return back the capital/AAIB-NCB/2                         |
|     |            | 05/13/1999 | 3.103 | 13000               | Violeta Spaho deposit into Int'l Commercial Bank/4         |
| 3.2 | Karavan    | 07/13/1999 | 3.201 | 23931.02            | Saudi Joint Relief Committee for Kosova/3                  |
|     |            | 06/16/1999 | 3.202 | 30000               | 1/2 Moon/Int'l Islamic Organization/2                      |
|     |            | 06/03/1999 | 3.203 | 20000               | 1/2 Moon/Saudi Joint Relief Committee for Kosova/2         |
|     |            | 06/02/1999 | 3.204 | 15000               | 1/2 Moon/Saudi Joint Relief Committee for Kosova/3         |
|     |            | 05/19/1999 | 3.205 | 30000               | Payment In Adv/1/2 Moon/Saudi Joint Relief/2               |
|     |            | 05/13/1999 | 3.206 | 60000               | Payment In Adv/1/2 Moon/Saudi Joint Relief/3               |
|     |            | 05/31/1999 | 3.207 | 600                 | Kosovar JV/1   |
| 3.3 | Karavan    | 12/28/1999 | 3.301 | 10000               | For Bridge of R. Dursi/Int'l Islam, Org/2                  |
|     |            | 12/28/1999 | 3.302 | 7220                | CAFO Expenses asked of Kadi/4                              |
|     |            | 12/24/1999 | 3.303 | 40500               | Payment/2  |
|     |            | 12/10/1999 | 3.304 | 237000              | Bank Transaction/3   |
|     |            | 12/10/1999 | 3.305 | 11,000              | Bank Transaction/2   |
|     |            | 11/18/1999 | 3.306 | 350000              | Transfer to CITIBANK (NY) from ICB/4                       |
|     |            | 10/06/1999 | 3.307 | 176763.02           | Transfer Between AAIB Accounts/4                           |
| 3.4 | Karavan    | 09/18/1999 | 3.401 | 190                 | Cash in Hand (1/2 Moon)/4                                  |
|     |            | 08/20/1999 | 3.402 | 315000              | Payment to Besnik Shtino for next project/2                |
|     |            | 07/08/1999 | 3.403 | 71500               | \$ to buy apt for Alintid head Mualim/4                    |
|     |            | 06/29/1999 | 3.404 | 44000               | \$ to Int'l Islamic Organization/4                         |
|     |            | 06/16/1999 | 3.405 | 30000               | Internal Transfer to Int'l Islamic Org/                    |
| 3.5 | Karavan    | 11/09/2001 | 3.501 | 12000(LEK)          | Int'l Islamic Charitable Org/Egyptian Embassy Stationary/3 |
| 3.6 | Karavan    | 10/24/1999 | 3.601 |                     | Payment Request for work (Jelaiden name on contract)/12    |
|     |            |            | 3.602 |                     | Work Itinerary   |
|     |            | 09/23/1999 | 3.603 |                     | Payment Request for work (Jelaiden name on contract)/4     |
|     |            | 08/10/1999 | 3.604 |                     | Payment Request for work (Jelaiden name on contract)/7     |
|     |            | 06/21/1905 | 3.605 |                     | Contract SIGNED BY JELAIDAN/1                              |
|     |            | 1999       | 3.605 |                     | Needs Arabic Translation                                   |
|     |            |            | 3.606 |                     | Saudi Jt Relief Ctte (JELAIDAN SIGNED CONTRACT)/2          |
|     |            | ?          | 3.606 |                     | Needs Arabic Translation                                   |
|     |            | 07/08/1999 | 3.607 |                     | Needs Albanian Translation                                 |
|     |            | ?          | 3.608 |                     | construction contract signed by Jelaiden                   |
|     |            |            |       |                     | Needs Albanian Translation                                 |
|     |            |            |       |                     | Arabic It. Requires translation                            |
| 3.7 | Karavan    | 02/05/1999 | 3.701 |                     | Saleh Apt contract (between Al Zainy and Saleh)            |
| 3.8 | Karavan    | 12/24/1999 | 3.801 |                     | Selling Reports (Saleh and Rayyan mentioned)               |
| 3.9 | Karavan    | 12/06/2001 | 3.901 | 30000               | Journal Entry/Cash in Hand/3                               |
|     |            | 12/08/2001 | 3.902 | 60000               | Journal Entry/Downpayment via Tirana Int'l Dev/11          |
|     |            | 12/07/2001 | 3.903 | 31000               | Journal Entry/Internal Transfer/4                          |
|     |            | 09/26/2001 | 3.904 | 10000               | Journal Entry/Cash Received AAIB \$6K - Cash \$4k          |
|     |            | 04/30/2001 | 3.905 | 5000                | Journal Entry/Cash in Hand/4                               |
| 4.1 | Karavan    | 12/08/2001 | 4.101 |                     | H & H - Karavan Lawyers/1                                  |

|     |                |            |       |             |  |                                     |
|-----|----------------|------------|-------|-------------|--|-------------------------------------|
|     |                | 12/05/2001 | 4.102 | 2925        | Payment Voucher/Nasser to CAFO & Alintid/3           | Needs Arabic Translation            |
|     |                | 11/01/2001 | 4.103 | 150000      | Payment/ Bahar Male (sp?)/2                          |                                     |
| 4.2 | Albanian Snack | 09/30/2001 | 4.201 |             | Income Statement 1/1/2001 - 9/30/2001                |                                     |
|     |                | 12/31/2000 | 4.202 |             | Cell Phone Calls by Abdel Fattah Nassar/5            |                                     |
|     |                | 02/23/2001 | 4.203 |             | Cash Report/1  |                                     |
|     |                | 1998/1999  | 4.204 |             | Petty Cash   |                                     |
| 4.3 | Karavan        | 03/02/2001 | 4.301 | 900000(LEK) | Payment Voucher/Alintid/1                            | Needs Arabic Translation            |
|     |                | 10/29/2001 | 4.302 |             | Reward and Punishment/1                              |                                     |
| 4.4 | Karavan        | 02/26/2000 | 4.401 | 15000       | Payment Voucher/to Nasser for Albanian Snack/2       |                                     |
|     |                | 12/15/2000 | 4.402 | 5000        | Payment Voucher/to Spaho for Exchange/2              |                                     |
|     |                | 12/11/2000 | 4.403 | 5000        | Payment Voucher/to Spaho for cash/2                  |                                     |
|     |                | 11/21/2000 | 4.404 | 5000        | Payment Voucher/Salary for November/2                |                                     |
|     |                | 11/07/2000 | 4.405 | 5000        | Payment Voucher/to Spaho for Exchange/3              |                                     |
|     |                | 11/07/2000 | 4.406 | 10000       | Payment Voucher/to Alba Beton for concrete/3         |                                     |
|     |                | 10/30/2000 | 4.407 | 20000       | Payment Voucher/Ylika Sula for concrete/3            |                                     |
|     |                | 10/16/2000 | 4.408 | 5000        | Payment Voucher/to Spaho for cash/3                  |                                     |
|     |                | 10/09/2000 | 4.409 | 10000       | Payment Voucher/to Spaho for exchange for payments/4 |                                     |
|     |                | 09/28/2000 | 4.41  | 5000        | Payment Voucher/to Donika Dlmo for New project/2     |                                     |
|     |                | 09/28/2000 | 4.411 | 25000       | Payment Voucher/to Donika Dlmo for New project/2     |                                     |
|     |                | 09/14/2000 | 4.412 | 5000        | Payment Voucher/to Spaho for exchange/3              |                                     |
|     |                | 08/17/2000 | 4.413 | 4000        | Payment Voucher/to Spaho for exchange/3              |                                     |
|     |                | 08/09/2000 | 4.414 | 4900        | Payment Voucher/to Spaho for exchange/3              |                                     |
|     |                | 08/01/2000 | 4.415 | 6000        | Payment Voucher/to Spaho for exchange/2              |                                     |
| 4.5 | Karavan        | 09/28/2000 | 4.501 | 5000        | Payment Voucher/to Danika Dlmo for new project/1     |                                     |
|     |                | 09/28/2000 | 4.502 | 25000       | Payment Voucher/to Danika Dlmo for new project/1     |                                     |
|     |                | 08/01/2000 | 4.503 | 6000        | Payment Voucher/to Tarek Nassar for Snack Factory/1  |                                     |
|     |                | 07/24/2000 | 4.504 | 5000        | Payment Voucher/to Tarek Nassar for Snack Factory/1  |                                     |
|     |                | 06/01/2000 | 4.505 | 4000        | Payment Voucher/to Tarek Nassar for Snack Factory/1  |                                     |
|     |                | 05/25/2000 | 4.506 | 5000        | Payment Voucher/to Tarek Nassar for Snack Factory/1  |                                     |
| 4.6 | Karavan        | 07/31/2000 | 4.601 | 300         | Payment Voucher/for expenses to Saleh land/3         |                                     |
| 4.7 | Karavan        | 99/00/01   | 4.701 |             | Journal Entries                                      |                                     |
| 4.8 | Karavan        | 2000       | 4.801 |             | Journal Entries                                      |                                     |
| 4.9 | Karavan        | 2001       | 4.901 |             | Journal Entries                                      |                                     |
| 5.1 | multi          |            | 5.101 |             | Journal Entries                                      |                                     |
| 5.2 | CAFO (?)       | 12/01/1998 | 5.201 |             | Work Program Notes                                   | cc to JELAIDAN, SYED, SIDIKI< JAMIL |
| 5.3 | Prosecutor     | 03/07/2002 | 5.301 |             | Request for Assistance from Albanian Govt            |                                     |
| 5.4 | Karavan JV     | 10/31/1998 | 5.401 |             | Trial Balance (signed by Spaho)                      |                                     |
| 5.5 | Qadi Group Dir | ?          | 5.501 |             | Letter to Directors from Nassar (payments/incomes)   |                                     |
| 5.6 | Karavan JV     | 12/31/1998 | 5.601 |             | Financial Report - 12/31/98/10 pages                 |                                     |
|     |                | 07/09/1998 | 5.602 |             | Debits/Credits/1                                     |                                     |
|     |                | 12/31/1997 | 5.603 |             | Qadi Personal Acct/2                                 |                                     |

|                      |            |       |  |   |
|----------------------|------------|-------|--|---|
|                      | 09/29/1998 | 5.604 | Loks Holli - Waled Abu Sheikha named/1                   |   |
|                      | 02/18/1998 | 5.605 | 1997 Financial Report to Kadi, Syed, nassar/9            |   |
|                      | 05/22/1998 | 5.606 | Fax to Qadi from Nassar Re: Financial Info/5             |   |
|                      | 05/12/1997 | 5.607 | Nassar Fax to Syed - on visit to Bosnia/1                |   |
|                      | ?          | 5.608 | Fax from Salah/1   | Needs Arabic Translation  |
| 5.7 CAFO             | 05/14/1996 | 5.701 | Employment Contract for Nassar (Kadi/Saleh principals)/7 | Needs Arabic Translation  |
|                      | 02/12/2001 | 5.702 | Balance between Lojal & Loks Holli/1                     | Signed by Nassar, al Zainy, Rayyan  |
|                      | 02/12/2001 | 5.703 | Balance between Medicare and AMC/1                       | Signed by Nassar, al Zainy, Ghani   |
|                      | 02/12/2001 | 5.704 | Villa Saleta/Club Apt/1                                  | Signed by Nassar, al Zainy, Rayyan  |
|                      | ?          | 5.705 | Letters along with fin documents                         | Needs Arabic Translation  |
| 5.8 Karavan          | 07/31/2000 | 5.801 | Trial Balance July/Y. Kadi New Project/11                |   |
|                      | 08/31/2000 | 5.802 | Trial Balance August/Y. Kadi New Project/14              |   |
|                      | 06/30/2000 | 5.803 | Trial Balance June/9                                     |   |
|                      | 10/31/2000 | 5.804 | Trial Balance October/Y Kadi Capital                     |   |
|                      | 04/02/2001 | 5.805 | 50000 Payment Voucher/Contribution for Project 2         |   |
| 5.9 Kadi Co.s        | 10/12/2000 | 5.901 | Year 2000 Financial Report                               | To Kadi from Dr. Nassar/cced Syed, ElZainy  |
|                      |            | 5.902 | Year 1999 Financial Report                               | To Kadi from Dr. Nassar/cced Syed, ElZainy  |
|                      |            | 5.903 | Year 1998 Financial Report                               | To Kadi from Dr. Nassar/cced Syed, Saleh  |
| 6.1 Karavan          | 12/28/2001 | 6.101 | AAIB Blocking Order of Kadi Accounts                     |   |
|                      | 04/11/2001 | 6.102 | NGO Letter   | Needs Arabic Translation  |
|                      | ?          | 6.103 | Transfer Instructions                                    | SWIFT thru CITI NY to Faisal Finance #36966325 USD\$                              |
|                      | 11/13/2000 | 6.104 | Coordination Council Albania                             | Needs Arabic Translation  |
|                      | 10/09/2000 | 6.105 | Special Power of Attorney for Saleh                      |   |
|                      | undated    | 6.106 | Grant (undated, unsigned) for Saleh rep by Elzainy       |   |
|                      | ?          | 6.107 | Kadi Passport  |   |
|                      | ?          | 6.108 | Kadi Letterhead Letter                                   | Needs Arabic Translation  |
| 6.2 Multi            | 05/03/1995 | 6.201 | Visit to Shkodra, Medresa Problem                        |   |
|                      | undated    | 6.202 | Handwritten Contract (unsigned)                          | Muslim Community/Joint Relief Committee of Kuwait                                 |
|                      | 06/06/1995 | 6.203 | Kuwait Joint Relief Committee                            | Needs Arabic Translation  |
|                      | ?          | 6.204 | Kuwait Joint Relief Committee/signed by Elzainy?         | Needs Arabic Translation  |
|                      | ?          | 6.205 | Letter/Form of Agreement                                 | Kuwait Joint Relief symbol  |
| 6.3 Alintid          | undated    | 6.301 | Project idea/Commercial Center Rnuga Kavaja              |   |
| 6.4 Karavan          | 04/19/2001 | 6.401 | Kadi construction contracts                              | Needs Albanian Translation  |
|                      |            | 6.402 | Saleh construction contracts                             | Needs Albanian Translation  |
| 6.5 Medicare/Karavan | 10/15/1997 | 6.501 | Karavan Residential Complex                              |   |
|                      | 10/31/1997 | 6.502 | Trial Balance for October 1997                           | To Kadi, From Elzainy/cced Syed, Saleh, Nassar                                    |
|                      | undated    | 6.503 | Finance Received (Kadi Account)                          | Signed by Voletta   |
|                      | ?          | 6.504 | Financial Opinion of Dr. Nassar (sent to Saleh)          |   |
|                      | 09/29/1996 | 6.505 | Fax Re Drugs/Medicines from India                        |   |
|                      | undated    | 6.506 | Medicare financials                                      | To CAFO From Ghani/Attn Dr. Nassar  |
|                      | 05/28/1996 | 6.507 | Strategy of Medicare                                     | Needs Arabic Translation  |
| 6.6 Muwafaq          | 10/16/1996 | 6.601 | Handwritten Letter in Arabic                             | Needs Arabic Translation  |
|                      | 05/08/1996 | 6.602 | Muwafaq contract signed by Petrit Musa                   | Needs Albanian translation  |
| 6.7 Kadi             | 04/17/2001 | 6.701 | 2001 Kadi Investor Trip                                  | Yamani, al Zainy, Kadi, bin Said, al Nami, al Qayem, Hafiz, Al Malik, Abdel Salam |
|                      | 05/17/1996 | 6.702 | Contract between Petrit Musa and Sheqir Peka             | Muwafaq Foundation  |

|     |         |            |       |  |  |
|-----|---------|------------|-------|--|--|
| 6.8 | Alintid | undated    | 6.801 | Production and Trading Accounts                      |  |
|     |         | undated    | 6.802 | Flow Chart   | Needs Arabic Translation   |
|     |         | undated    | 6.803 | Flow Chart   | Needs Albanian Translation   |
|     |         | ?          | 6.804 | Kadi Letter  | Needs Arabic Translation   |
|     |         | 02/17/1998 | 6.805 | Meeting Minutes                                      | Dr. Nasar/Eng Deadin/Amr Elzainy   |
| 6.9 | Karavan | 11/05/1999 | 6.901 | Selling Report                                       |  |
| 7.1 | Karavan | 05/11/1999 | 7.101 | 10000 Payment Voucher (for exchange/check)           | Deposit in Bank 7017/signed by V. Spaho Plus summary of exchanges for all 1999 |
|     |         | 05/07/1999 | 7.102 | 15000 Payment Voucher (for exchange/check)           | signed by V. Spaho   |
|     |         | 05/07/1999 | 7.103 | 10000 Payment Voucher (for exchange/cash)            | signed by V. Spaho   |
|     |         | 05/04/1999 | 7.104 | 5000 Payment Voucher (for exchange/cash)             | signed by V. Spaho   |
|     |         | 04/29/1999 | 7.105 | 4000 Payment Voucher (for exchange/check)            | signed by V. Spaho   |
|     |         | 04/29/1999 | 7.106 | 10000 Payment Voucher (for exchange/check)           | ?  |
|     |         | 04/28/1999 | 7.107 | 5000 Payment Voucher (for exchange/check)            | signed by V. Spaho   |
|     |         | 04/26/1999 | 7.108 | 20000 Payment Voucher (deposit in A/C # 100347)      | signed by V. Spaho   |
|     |         | 04/26/1999 | 7.109 | 30000 Payment Voucher (deposit in bank 707)          | signed by V. Spaho   |
|     |         |            |       | Additional Vouchers Not Listed (Full List in Binder) |  |
| 7.2 | multi   | 09/14/1999 | 7.201 | 178000 Saleh withdrawals from Kadi accounts          | For Sayed/From Nassar "Regarding your fax dated 9/13/1999)                     |
|     |         | 03/31/1999 | 7.202 | Cell Phone Calls (Medicare)                          | Tariq Nassar's cell phone  |
|     |         | undated    | 7.203 | Notes to Balance                                     |  |
|     |         | 12/31/2001 | 7.204 | Tariq Nassar/family application for US VISA          |  |
|     |         | undated    | 7.205 | Depozitna Banka DD Bank Card                         |  |
| 7.3 | Karavan | ?          | 7.301 | Saudi Joint Relief Kosova Regional Office            | Needs Arabic Translation   |
|     |         | ?          | 7.302 | Saudi Joint Relief Kosova Regional Office            | Needs Arabic Translation   |
|     |         | ?          | 7.303 | Karavan Doc with Jelaidan signature                  | Needs Arabic Translation   |
|     |         | ?          | 7.304 | Karavan Doc  | Needs Arabic Translation   |
|     |         | ?          | 7.305 | Letter in Arabic/Fax backup                          | Needs Arabic Translation   |
|     |         | ?          | 7.306 | Letter in Arabic/Attn Fores Hadag                    | Needs Arabic Translation   |
|     |         | ?          | 7.307 | Letter in Arabic/Cost List                           | Needs Arabic Translation   |
|     |         | 21/1999    | 7.308 | Newspaper Ad for Karavan                             | Needs Arabic Translation/Needs Albanian translation                            |
|     |         | 08/11/1999 | 7.309 | Photo of Unknown Man/Building site                   |  |
|     |         | ?          | 7.31  | Packet + Photos                                      | Needs Arabic Translation   |
|     |         | ?          | 7.311 | Blue Print   | Looks like Jelaidan Signature  |
|     |         | 05/10/1999 | 7.312 | Saudi Joint Relief Committee for Kosova              | Jelaidan Signature   |
|     |         | ?          | 7.313 | Rough Drafts   | Looks Like Jelaidan Signature  |
|     |         | ?          | 7.314 | Saudi Joint Relief Committee for Kosova              | Needs Arabic Translation   |
|     |         | ?          | 7.315 | Looks like Red Crescent Note                         |  |
| 7.4 | Karavan | 11/28/1999 | 7.401 | Transfer Instructions to ICB                         | Authorize ElZainy to act on accnts thru 31 Dec 1999                            |
|     |         | 12/17/1999 | 7.402 | Signature Instructions for AAIB                      | Medicare A/C 100104/100459 for Ghanim, Tarek Nassar, Amir Elzainy              |
|     |         | 12/17/1999 | 7.403 | Signature Instructions for AAIB                      | Lojal Company A/C 100164 for Rayan, Tarek Nasser, ElZainy                      |
|     |         | 03/30/1998 | 7.404 | Jelaidan Travel Instructions                         | Needs Albanian Translation   |
|     |         | 06/08/1998 | 7.405 | Signature Instructions for AAIB                      | Saleh, Elzainy, Dr Nassar  |
|     |         | 12/17/1999 | 7.406 | Signature Instructions for AAIB                      | For Personal Act of Kadi/Elzainy, Tariq Naser                                  |
|     |         | 11/22/1999 | 7.407 | Letter to Ilir Meta, PM Albania                      | ElZainy asking for meeting   |
|     |         | 09/16/1999 | 7.408 | Alintid/Karavan JT Venture-Repay. For Capital        | To ElmoAllami, cc Kadi, from Elzainy   |
|     |         | 07/08/1999 | 7.409 | Authorization Instructions for AAIB                  | Saleh and ElZainy authorize ElZainy to make transactions                       |
| 7.5 | Muwaqaf | ?          | 7.501 | List   | Needs Arabic Translation   |
|     |         | 08/13/1996 | 7.502 | Contract signed by Petrit Musa                       | Needs Albanian Translation   |
|     |         | ?          | 7.503 | Muwaqaf doc. signed by Petrit Musa                   | Needs Arabic Translation   |

|     |                   |            |  |  |
|-----|-------------------|------------|--|--|
|     | ?                 | 7.504      | Muwafaq doc. signed by Petrit Musa         | Needs Albanian Translation                                     |
|     | 06/01/1996        | 7.505      | Muwafaq doc. signed by Petrit Musa - as DG | Needs Albanian Translation                                     |
|     | ?                 | 7.506      | Muwafaq doc. signed by Petrit Musa         | Needs Albanian Translation                                     |
|     | ?                 | 7.507      | Karavan doc. Signed by al Zainy            | Needs Arabic Translation                                       |
|     | 08/02/1995        | 7.508      | Construction Dept Monthly Report - July    |  |
|     | ?                 | 7.509      | Note from Kadi on his personal letterhead  | Needs Arabic Translation                                       |
|     | ?                 | 7.51       | Doc. Signed by Petrit Musa                 | Needs Albanian Translation                                     |
|     | 08/12/1995        | 7.511      | Muwafaq doc. Signed by Petrit Musa         |  |
|     | 09/23/1995        | 7.512      | Muwafaq doc. Signed by Petrit Musa         |  |
|     | 08/22/1995        | 7.513      | Muwafaq doc. Signed by Petrit Musa         |  |
|     | 07/16/1995        | 7.514      | Muwafaq doc. Signed by Petrit Musa - as DG |  |
| 7.6 | Karavan           | 04/17/1997 | 7.601                                      | Muwafaq doc. Signed by Petrit Musa                             |
|     |                   | 11/18/1996 | 7.602                                      | Karavan Construction Records for FLS                           |
|     |                   | ?          | 7.603                                      | Karavan Construction Records                                   |
|     |                   | ?          | 7.604                                      | Karavan Construction Records                                   |
| 7.7 | Kadi Accounts/FLS | ?          | 7.701                                      | Charity Accounts   |
|     |                   | 04/27/2001 | 7.702                                      | Saleh fax to Musa concerning FLS money flow problems           |
|     |                   | 03/01/2001 | 7.703                                      | 2000 AAIB check to Musa from Kadi                              |
|     |                   | 01/12/2001 | 7.704                                      | 23700 Internal Transfer from Kadi Acct to FLS                  |
|     |                   | ?          | 7.705                                      | Kadi Request to el zainy to pay former Saleh driver            |
|     |                   | 09/15/2000 | 7.706                                      | 15996 Internal Transfer from Kadi Acct to FLS                  |
|     |                   | 07/25/2000 | 7.707                                      | 12333 Internal Transfer from Kadi Acct to FLS                  |
|     |                   | 05/17/2000 | 7.708                                      | 12333 Internal Transfer from Kadi Acct to FLS                  |
|     |                   | 03/10/2000 | 7.709                                      | 9000 Internal Transfer from Kadi Acct to FLS                   |
|     |                   | 02/23/2000 | 7.71                                       | 12333 Internal Transfer from Kadi Acct to Nassar/al Zainy      |
|     |                   | ?          | 7.711                                      | Budget for Charitable Activities                               |
|     |                   | ?          | 7.712                                      | 4000 ICB check to Musa   |
|     |                   | 01/19/2000 | 7.713                                      | 2000 Revival (?) - Musa NGO receipt of Kadi donation           |
|     |                   | 12/20/1999 | 7.714                                      | 2000 Revival (?) - Musa NGO receipt of Kadi donation           |
|     |                   | ?          | 7.715                                      | 4320 Kadi Request to el zainy to pay former Saleh driver       |
|     |                   | 12/20/1999 | 7.716                                      | 4000 Al Zainy/Nassar request payment to Musa from Kadi acct    |
| 7.8 | Muwafaq           | undated    | 7.801                                      | 440000 1996 Construction Projects Report                       |
|     |                   | ?          | 7.802                                      | Handwritten Arabic Letter                                      |
|     |                   | 07/29/1994 | 7.803                                      | Handwritten Letter on Muwafaq Letterhead                       |
| 7.9 | Kadi Accts        | 10/06/1997 | 7.901                                      | Internal Controls  |
| 8.1 | Loxhall Contract  | 09/10/1997 | 8.101                                      | Contract envolving Abdul Latif Saleh                           |
|     |                   | 02/27/1998 | 8.102                                      | Loxhall doc naming Yassin Kadi                                 |
| 8.2 | Selling Report    | 12/24/1999 | 8.201                                      | Marketing Department sales report of who purchased apts        |
| 8.3 | Selling Report    | 12/30/1999 | 8.301                                      | Marketing Department sales report of who purchased apts        |
| 8.4 | Karavan           | 10/18/1999 | 8.401                                      | 150000 Payment Voucher to Behar Male cash                      |
|     |                   | 09/20/1999 | 8.402                                      | 15000 Payment Voucher to Violet Spaho cash                     |
|     |                   | 09/19/1999 | 8.403                                      | 15000 Payment voucher to deposit A/C 10037 AAIB bank           |
|     |                   | 06/09/1999 | 8.404                                      | 500 Payment for lawyers Arton Hajdari                          |
|     |                   | 04/30/1999 | 8.405                                      | 35000 Payment for Behar Mele , contribution for proj N2 cash   |
|     |                   | 01/10/2001 | 8.406                                      | 50000 Payment for Behar Mele , contribution for next proj cash |
| 8.5 | Karavan           | 10/02/1996 | 8.501                                      | 200000 Request to AAIB for funds transfer                      |

|          |                |            |       |   |   |
|----------|----------------|------------|-------|---|---|
| 8.6      | Loxhall Report | 09/11/2001 | 8.601 | Realestate Monthly Cash Flow Budget   |   |
|          |                | 09/04/2001 | 8.602 | 130000 Ltr to AAIB to pay Yassin Kadi   |   |
| 8.7      | Loxhall        |            | 8.701 | undated/unsigned handwritten ltr to Messrs Targestee and Lasso re> BL concerning 3 containers shipped to them from Jordan via Trieste |   |
|          |                |            | 8.702 | Arabic ltr requires translation   |   |
|          |                | 12/29/1995 | 8.703 | AAIB bank Statement   |   |
| 8.8      | CAVO           | 03/27/2001 | 8.801 | Memo re: Joint financial unit author Dr. A. Nassar  |   |
|          |                | ?          | 8.802 | email frm masood syed to Abdul Fattah re financial statement to Yassin Kadi   |   |
|          |                | 09/15/2000 | 8.803 | memo to Masood Syed to Abdul Fattah Nassar re: expected cash transfers  |   |
|          |                | 11/29/2000 | 8.804 | faxed arabic ltr. Requires translation  |   |
|          |                | 02/12/2001 | 8.805 | faxed arabic ltr. Requires translation  |   |
|          |                | 04/08/1999 | 8.806 | memo to Yassin Kadi cc Masood Syed  | re assignment of Cavallo Ltd -Jordan                                    |
|          |                | 04/29/1999 | 8.807 | memo frm Abdul Fattah Nassar to Yassin Kadi cc Massod   | Syed/Waleed Abu Sheikha re: Cavallo Ltd                                 |
|          |                | 03/04/1999 | 8.808 | memo frm Abdul Fattah Nassar to Yassin Kadi cc Massod   | syed re: payment for travel   |
|          |                | ?          | 8.809 | arabic document requires translation  |   |
|          |                | 04/24/2000 | 8.811 | memo fm Abel fattah Nassar to Yassin Kadi/Masood Syed   | subject Claims of Abdul lateef Saleh                                    |
|          |                | 04/07/1999 | 8.811 | fax fm Yassin Kadi to Abdul Fattah Nassar   | subject: assignment to Cavallo Ltd Jordan                               |
|          |                | 09/12/1999 | 8.812 | memo frm Abdul Fattah Nassar to Massod Syed   | subject:Loks Hall Albania   |
|          |                | 03/25/2000 | 8.813 | memo fm Abel fattah Nassar to S. Abdurrahman  | cc Waleed Sheikha/Mr. Adriyana re: Financial Statement of Saba Group    |
|          |                | 04/01/2000 | 8.814 | memo fm Masood Syed to Abdul Fattah Nassar  | subject Claims of Abdul lateef Saleh                                    |
|          |                | ?          | 8.815 | notes of Abdul Lateef translated by Yousef Abu Ali  | appear to be re Saleh claims  |
|          |                | 07/18/2000 | 8.816 | memo fm Abel Fattah Nassar to Abdul Salah/masood syed   | profit and loss of Yassin Kadi group of companies in Albania            |
|          |                | 07/16/2000 | 8.817 | memo to masood Syed/ to Abdul Fattah Nassar/yassin kadi   | profit and loss of Yassin Kadi group of companies in Albania            |
| Karavan  | ?              |            | 8.818 | work regulations/accting system report  |   |
| Medicare | 09/20/1998     |            | 8.819 | memo fm Masood Syed to Abdul Fattah Nassar  | re owners equity -consolidated position of Albanian Group               |
| Karavan  | ?              |            | 8.82  | Balance in English  |   |
|          | ?              |            | 8.821 | Arabic Doc requires translation   |   |
| Karavan  | ?              |            | 8.822 | email frm amr Elzainy to Yassin Kadi/Masood Syed  | more details for info sent by Abdul Fattah Nassar                       |
|          | ?              |            | 8.823 | memo fm Abdel Fattah Nassar to Abdul Lateef Saleh   | cc Masood Syed profit and loss of Yassin Kadi group/Albania handwritten |
| 8.9      | Karavan        | 04/06/2001 | 8.901 | memo fm Amr Elzainy to Rogner Hotel   | reserving rooms for delegation  |
|          |                | 06/13/2000 | 8.902 | memo fm Karavan to AAIB   | adding/subtracting names to bank accts                                  |
|          |                | 04/15/1996 | 8.903 | memo frm kadi to Karavan  | re financial facilities agreement                                       |
|          |                | 11/17/1998 | 8.904 | memo frm Amr Alzainy to Kadi/syed/saleh/abdul nassar  | report of progress of residential complex                               |
|          |                | 02/05/1999 | 8.905 | sales contract of apt purchased by Yassin Kadi  |   |
|          |                | ?          | 8.906 | sales brochure of twin towers   |   |
|          |                | ?          | 8.907 | empl contract between Abdul Saleh and Yassin Kadi   |   |
|          |                | 11/18/1998 | 8.908 | sales contract of apt purchased by Festim Hoxha   | Albanian residing in the US in Rye, NY                                  |
|          |                | ?          | 8.909 | organization chart of Karavan co/Karavan Residential proj   |   |
| 9.1      | Medicare       | 05/09/1996 | 9.101 | DHL airwaybill fm Abdul Latif to Yassin Kadi  | addres in Istanbul, Turkey  |
|          |                | 04/17/2001 | 9.102 | presentation to Yassin Kadi   |   |
|          |                | 08/23/2000 | 9.103 | Albanian permission to work for Abdel fattah nassar   |   |
| 9.2      | Kadi           | ?          | 9.201 | Statement of Acct #000101   | shows debit for charity/CAFO/others                                     |
| 9.3      | Karavan        | 10/14/2001 | 9.301 | YEAR 2001 3RD QUARTER FINANCIAL REPORT  |   |
|          |                | 02/16/2000 | 9.302 | Special Proxy for Abdul Latif Saleh   |   |
|          |                | 12/12/1995 | 9.303 | Court Decision re registration of Karavan   |   |
| 9.4      | Telephone Bill |            | 9.401 | Albanian Mobile Communications Bill for 1998  | 16 separate bills   |
| 9.5      | Telephone Bill |            | 9.501 | Albanian Mobile Communications Bill for 1999  | 7 separate bills  |

|      |                    |            |        |   |   |
|------|--------------------|------------|--------|---|---|
| 9.6  | Abdul Latif Saleh  | 03/03/1999 | 9,601  | Sales contract for purchase of Apt by Saleh                     |   |
| 9.7  | Alintid            | 03/24/2002 | 9,701  | Itr to Marsel Skendo fm Omar Hafez                              | acknowledge Itr of 3/20/2002, delegation will arrive to make deal |
|      |                    | 03/16/2002 | 9,702  | fax cover sheet fm Yassin Kadi Group w/2 ltrs atch              | 2 hrs follow  |
|      |                    | 02/17/2002 | 9,703  | Itr fm Islamic Dev Bank, Jeddah to Min Econ Coop Albania        | regarding Alintid   |
|      |                    | 03/16/2002 | 9,704  | Itr fm Abdel Fattah Nassar to Yassin Kadi/Massod Syed           | Handwritten,  |
| 9.8  | Yassin Kadi        | 04/19/2001 | 9,801  | sales contract for purchase of apt by Albanian Int'l Invest/Dev |   |
| 9.9  | Muwafaq            | ?          | 9,802  | arabic document requires translation                            |   |
|      |                    | 12/20/1996 | 9,803  | Albanian document requires translation                          |   |
| 10.1 | Krume              | ?          | 10,101 | Arabic Document Requires translation                            |   |
| 10.2 | Taken Out          |            |        |   |   |
| 10.3 | Alintid            | 1995       | 10,301 | general ledger info 1995  |   |
| 10.4 | American Bank AL   | ?          | 10,401 | Itr explaining how to transfer USD in Albania to their bank     |   |
| 10.5 | Saeed Al Asmary    | 05/26/1998 | 10,501 | Certificate of Tax Registration In Albanian                     |   |
| 10.6 | Medicare AAIB Acct |            |        |   |   |
| 10.7 | Kadi Group         | 01/21/1997 | 10,701 | Annual Report 1996  |   |
| 10.8 | Karavan            | 06/01/1999 | 10,801 | 30000 Payment Voucher - cash paid to Abdul Latif Saleh          |   |
|      |                    |            | 10,802 | 30000 Payment Voucher - cash paid to Abdul Latif Saleh          |   |
|      |                    |            | 10,803 | 30000 Payment Voucher - cash paid to Abdul Latif Saleh          |   |
|      |                    |            | 10,804 | 30000 Payment Voucher - cash paid to Abdul Latif Saleh          |   |
|      |                    |            | 10,805 | 30000 Payment Voucher - cash paid to Abdul Latif Saleh          |   |
| 10.9 | Muwafaq            | Mar-99     | 10,901 | Payment Voucher - signed by named Al Harimain member            |   |
| 11.1 | Emad Saad Qasim    | ?          | 11,101 | Passport all pages info on WAQF                                 |   |
| 12.1 | Muwafaq            | ?          | 12,101 | SHIK file   |   |
| 13.1 | Musa               | 05/16/2002 | 13,101 | Musa signed statement re honesty beginning 2nd interview        |   |
| 14.1 | MADC               | ?          | 14,101 | MADC Brochure   |   |
| 15.1 | MUSA               | ?          | 15,101 | SHIK File   |   |

